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ARIZONA CORPORATION COMMISSION  
RECORDS CONTROL

**IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S  
COMPLIANCE WITH § 271 OF THE  
TELECOMMUNICATIONS ACT OF 1996**

**Docket No. T-00000A-97-0238**

**AT&T'S COMMENTS ON DRAFT  
FINAL REPORT**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively, "AT&T") hereby file their comments on the Draft Final Report of the Qwest OSS Test, version 1.0, dated December 21, 2001 ("Draft Final Report" or "Report")

**I. INTRODUCTION**

On December 21, 2001, Cap Gemini Telecom Media & Networks U.S., Inc. d/b/a Cap Gemini Ernst & Young ("CGE&Y") issued the Draft Final Report. The Draft Final Report incorporates the findings and conclusions of CGE&Y on the Retail Parity Evaluation ("RPE"), the Relationship Management Evaluation ("RME"), the Capacity Test ("CT"), the Functionality Test ("FT"), and Performance Measurement Evaluation ("PME") conducted on Qwest Corporation's ("Qwest") operations support systems ("OSS"). Although the Draft Final Report contains over 600 pages, the Arizona Corporate Commission ("Commission") should not

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consider the size of the Draft Final Report to be any indicator of the quality of contents of the Report or as adequate to support the ultimate findings or conclusions contained therein.

The Draft Final Report is just that – a draft. It is the first report that incorporates the individual, interim reports issued on each of the five tests performed on Qwest’s OSS – the RPE, RME, CT, FT, and PME.<sup>1</sup> The Report should also reflect the results of the workshops held on each of the five tests and the retesting performed to verify that the earlier deficiencies or problems discovered by CGE&Y during testing have been corrected by Qwest.<sup>2</sup>

There are major problems with the Report. These problems take the form of 1) unsupported findings and conclusions, 2) findings and conclusions that are contrary to the test results, 3) the failure to make findings and conclusions warranted by the test results, 4) the failure to require corrective action by Qwest to resolve deficiencies,<sup>3</sup> 5) the failure to do the required analyses contained in the test documentation, and 6) the failure to comply generally with the Master Test Plan and Test Standards Document. All of these problems, along with the failure to close IWOs in accordance with Appendix I to Test Standards Document (“TSD”)<sup>4</sup> and meet all the exit criteria prior to issuance of the Draft Final Report, verify that the Draft Final Report should never have been issued prior to the resolution of these problems. However, in spite of those problems and in spite of assurances by Staff that the Report would not be issued if the quality or integrity of the OSS test would suffer, the Draft Final Report was released on December 21, 2001. This has placed an unwanted burden on the competitive local exchange

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<sup>1</sup> There is an additional component of the OSS test – the Performance Measurement Audit. On December 21, 2001, CGE&Y issued the Qwest Performance Measurement Audit: Final Report, version 3.0, dated December 21, 2001, which contains the results of the Performance Management Audit.

<sup>2</sup> Although workshops were scheduled and held on the different components of the test, many issues were not addressed, either because of a lack of time or the failure of CGE&Y to do the analysis required by the test documentation. These issues will be addressed in the workshop to be held on the Draft Final Report.

<sup>3</sup> Generally, this can take one of two forms: 1) the failure to open an Incident Work Order (IWO) for a problem, or 2) the premature closure of an IWO without verification of the corrective action taken by Qwest.

carriers (CLECs") to raise and point out test deficiencies numerous times and request safeguards from Administrative Law Judges, to no avail.

## **II. RETAIL PARITY EVALUATION**

CGE&Y makes the following overall conclusion in its Retail Parity Evaluation:

[T]he the experience of a CLEC using the various available OSS interfaces is substantially the same to that of Qwest performing similar activities using internal OSS interfaces. CGE&Y also concludes that Qwest provides CLECs with non-discriminatory access to its OSS for the purposes of initiating service requests and M&R trouble transactions.<sup>5</sup>

AT&T believes that the record shows that CGE&Y continues to have insufficient evidence to make this conclusion. This was evidenced by the interim Retail Parity Evaluation Report, the responses CGE&Y provided in the Retail Parity workshop and the results of retesting that CGE&Y conducted. The CGE&Y Draft Final Report does not cure these deficiencies. In fact, AT&T believes that the evidence shows that Qwest is not providing CLECs with nondiscriminatory access to its OSS.

CGE&Y stated that its conclusions "were based upon three types of evaluations, qualitative, quantitative and timeliness, all of which were taken into account whenever possible."<sup>6</sup> AT&T believes that the record shows that Qwest's system and interface performance to CLECs in comparison to its performance for retail customers is lacking in all three of the areas that CGE&Y stated it considered in making its overall conclusion. With negative results in each of the three evaluation types, and inconclusive evidence produced by retesting, it is inappropriate for CGE&Y to reach an overall conclusion that Qwest provides nondiscriminatory access.

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<sup>4</sup> The operative document is Cap Gemini Telecommunications 271 Test Standards, version 2.10, dated September 6, 2001.

<sup>5</sup> Draft Final Report at 11.

<sup>6</sup> TR 39, II. 4-7 (Aug. 7, 2001).

In addition to reaching overall conclusions that were not supported by the underlying findings, CGE&Y failed to perform key activities according to the requirements of the Master Test Plan ("MTP").<sup>7</sup> Without completing the evaluation activities required by the TSD, it is premature for CGE&Y to reach any conclusion, much less a conclusion of nondiscriminatory access.

**A. CGE&Y Failed to Complete Activities Required by the TSD.**

**1. CGE&Y Failed to Count the Cumulative Number of Auto-Populated or Selectable Fields.**

Section 4.2.3(a) of the TSD, version 2.10, contains the following requirement:

The cumulative number of auto populated or selectable fields (previously auto-populated from a query) will be counted for each retail parity test order and compared between resale and retail. Fields required for Qwest retail customer credit information will not be counted.

This is one of two activities identified in the TSD for the evaluation of the pre-order to order integration. CGE&Y admitted that its failure to comply with the TSD requirement to count the number of auto populated or selectable fields was "an oversight and we did not comply with it."<sup>8</sup> CGE&Y did indicate in conjunction with its admission that it failed to count the auto populated or selectable fields that, "we can endeavor to do that and we have the backup information and we can do that."<sup>9</sup> In earlier comments, AT&T insisted CGE&Y be required to complete this important activity.

In its Draft Final Report, CGE&Y claims that it evaluated the quantity of pre-order and order transactions and found that the average number of required fields for resale was greater

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<sup>7</sup> The operative document is Master Test Plan for Testing Qwest's Operations Support System in Arizona, version 4.2, dated June 29, 2001.

<sup>8</sup> TR 252, ll. 3-4 (Aug. 8, 2001).

<sup>9</sup> *Id.*, ll. 4-5 (Aug. 8, 2001).

than the average number of required fields for retail for simple POTS services. It also concludes: "The average number of steps required was consistently more for resale than for retail for all services tested." While it comments that 15% of the fields required for POTS were manual entry for CLECs,<sup>10</sup> it fails to address the essential disparity -- that CLEC representatives must perform additional data entry than do Qwest representatives to issue equivalent orders. CGE&Y notes that AZIWO1111 was closed on the basis of a quantification of the number of fields. It fails to consider the broader issue, that Qwest's systems discriminate against CLEC representatives by increasing the size of the task of order issuance.

CGE&Y has failed to analyze and report on the cumulative activities involved and makes no evidence available in its testing documentation that reflects such quantitative analysis was performed.

**2. CGE&Y Failed to Compare the Capabilities of Edit and Error Checking Available to CLECs using the IMA-GUI and EDI Interfaces to Those of Qwest Retail Representatives Using Retail Interfaces.**

Section 4.1 of the TSD, version 2.10, requires CGE&Y to answer the question:

Are the edit and error checking capabilities available to CLECs using the IMA-GUI and EDI interfaces to create orders substantially the same to the capabilities of a Qwest customer service representative using the retail interfaces[?]

CGE&Y failed to answer this question in its interim Retail Parity Final Report. Instead of evaluating the relative capabilities, as required by the TSD, CGE&Y only noted that "both sides had error-checking capabilities."<sup>11</sup> CGE&Y did not evaluate whether the relative edit and error checking capabilities were the *same*. CGE&Y "*presumed* [the relative edit and error-checking

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<sup>10</sup> Draft Final Report, § 3.1.4.

<sup>11</sup> TR 386-87 (Aug. 8, 2001).

capability] was the same.”<sup>12</sup> CGE&Y was required to complete an evaluation of the relative edit and error-checking capabilities available to CLECs and Qwest retail representatives.

Its testing of the edit and error checking capabilities occurred in November, 2001. CGE&Y’s records show that it evaluated the edits and error messages for fourteen (14) rejected CLEC-entered service requests. It concludes in its Draft Final Report that during the Retail Parity re-evaluation that the edit and error checking capabilities of IMA-GUI are sufficient for the resale representative to identify and correct any errors on a LSR.<sup>13</sup> This is not the testing that is required per the TSD and not the retesting that CGE&Y agreed to do.<sup>14</sup> The appropriate retesting would have required CGE&Y to evaluate the IMA, EDI, and the retail interface edit and error-checking resources made available to Qwest service representatives. It did not. No test scripts were used to generate retail errors or order rejections. No data requests were issued to Qwest for samples of edit and error messages that may have shed some light on the disparities between resale and retail. CGE&Y failed again to conduct the necessary testing of the edit and error-checking capabilities and has failed to demonstrate that Qwest’s systems meet the requirements according to the TSD.

CGE&Y concludes: “The error messages ... are clear and concise. The error messages tell the resale representative what section (LSR, EU, Resale, etc. form) and field (APTCN, TOA, AGAUTH, etc.) on the LSR the error is contained in.”<sup>15</sup> AT&T’s review of the Qwest system outputs obtained from the Document Viewing Room show just how unclear and lengthy the error messages are. For an error in local service request WSNCT2001 and WSNCT2002, Qwest’s system generated 53 lines of single-spaced error messages, none of which identify the

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<sup>12</sup> TR 387, ll. 11-12 (Aug. 8, 2001) (emphasis added).

<sup>13</sup> Draft Final Report, § 3.1.4.3 (14).

<sup>14</sup> CGE&Y Retail Parity Proposed Re-Evaluation, dated October 26, 2001.

<sup>15</sup> Draft Final Report, § 3.1.4.3 (14).

reason that the order was rejected. All of the lines suggest possible corrections that could be made in order to resubmit the request. The Qwest error messages are confusing and fail to indicate exactly what problem Qwest's systems encountered in processing the order. Since there are no Qwest retail error messages to review because CGE&Y did not retest the retail equivalent of these orders, there is no information that supports CGE&Y's determination that this exit criteria is satisfied. AT&T Exhibit 1 is the error message content for LSRs WSNCT2001 and WSNCT2002.

In its commentary on the Qualitative Measures for Retail Parity testing of the edit and error-checking comparability issue,<sup>16</sup> CGE&Y notes: "There were no errors encountered when submitting the retail orders."<sup>17</sup> Were this to be provable on the basis of CGE&Y actually having conducted the required retesting, the disparity between the Qwest retail and resale processing would be manifest in another way – Qwest's systems reject CLEC orders for reasons that do not affect retail orders. No documents are contained in the CGE&Y Retail Parity Re-Evaluation records that support CGE&Y's statement that there were no errors encountered in the retail portion of the edit and error-checking tests.

### **3. CGE&Y Failed to Compare and Evaluate the Abilities to Request Large Blocks of Telephone Numbers.**

Section 4.2.6, version 2.10, of the TSD requires that CGE&Y complete the following activity:

The ability to request a large block of TNs, in the same serving area, will be compared between a Qwest Service Representative and a Pseudo-CLEC Service Representative. The number of steps required, the amount of information required and returned, and the timeliness of response will be measured.

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<sup>16</sup> TSD §4.1.15.

<sup>17</sup> Draft Final Report, § 3.1.4.3 (14).

Performance of the paired test scripts will be coordinated to within 1 minute of each other for this particular comparison.<sup>18</sup>

CGE&Y failed to complete this activity by the time it had issued its interim Final Report on Retail Parity. CGE&Y only noted that when requesting large blocks of telephone numbers ("TNs"), both CLECs and Qwest had to use a manual process.<sup>19</sup> CGE&Y failed to compare, as was required by the TSD, for both CLEC and Qwest retail representatives, the number of steps required, the amount of information required and returned and the timeliness of response.

CGE&Y did not know if the telephone number that CLEC and Qwest customer service representatives must call to reserve large blocks of TNs is the same or if CLEC and Qwest customer service representatives call the same work center.<sup>20</sup> CGE&Y did not evaluate whether the manual processes for reserving large blocks of TNs for CLEC and Qwest customer service representatives are equal.

In its Draft Final Report, CGE&Y states that it has determined that there are different work centers that CLECs and Qwest representatives contact to reserve large blocks of TNs and that the procedure to obtain the reservations are dissimilar, with Qwest representatives having access to a more economical and efficient method than that afforded to CLECs.<sup>21</sup> CGE&Y did not find a documented CLEC process or procedure in the Qwest system or website documentation that advises a CLEC how to go about reserving large blocks of TNs. It was required to submit a data request to Qwest to determine how to go about making such a reservation.<sup>22</sup> The lack of a documented process and procedure required the issuance of an IWO. However, CGE&Y failed to make a finding that CLECs wanting to perform this sort of

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<sup>18</sup> TSD, § 4.2 (6).

<sup>19</sup> TR 304, ll. 11-16 (Aug. 8, 2001).

<sup>20</sup> TR 304-305 (Aug. 8, 2001).

<sup>21</sup> Draft Final Report, § 3.1.4.3 (6).



reservation, which is extremely important to CLEC users of resale Centrex and PBX as well as UNEs involving Qwest Centrex and PBX products, had no documented process and procedure to follow.

When it finally determined what the procedure was to make a reservation, CGE&Y made three (3) contacts to Qwest through the Pseudo-CLEC and monitored one (1) Qwest reservation to reserve blocks of new telephone numbers. It found that CLEC and Qwest representatives receive the reserved numbers during the course of the call placed to the separate Qwest work centers. It found that in each case of the CLEC activities, the representative was placed on hold for extended periods of time. The Qwest representatives received the reservations nearly three times faster than did the Pseudo-CLECs' representatives. When CGE&Y evaluated the experiences to obtain additional TNs for existing end users, the disparities were far greater. CLEC representatives cannot receive the reserved numbers during the contact, because Qwest sends them by fax afterwards. The Qwest representative receives the TNs during the call placed to the Qwest work center. The amount of time the Pseudo-CLEC representative was on hold exceeded the amount of time that the Qwest representatives took to actually receive the reserved numbers. The time for the Pseudo-CLEC to receive the reserved numbers by fax took additional time. The whole process for the Pseudo-CLEC ranged from 23 minutes to one hour and 10 minutes as contrasted with the retail experience of 11 minutes.<sup>23</sup> Qwest provides its representatives the abilities to expand an existing, large customer's telephone number coverage from two to six times faster than it provides to a CLEC.

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<sup>22</sup> CGE&Y issued Data Request 192 on May 18, 2001: "What process is available to the CLEC Service Representative, using EDI, to request/reserve a large block of TNs (35 to 50)?

<sup>23</sup> Draft Final Report, § 3.1.4.3 (6).

CGE&Y ignores the obvious disparate treatment afforded to CLECs and answers “Yes,”<sup>24</sup> to the TSD question: “Is the procedure used to reserve large blocks of TNs substantially the same for both a Pseudo-CLEC Service Representative and a Qwest Service Representative?”<sup>25</sup> The testing requirements for this issue are clearly stated in the TSD. CGE&Y failed to test appropriately.

<b>TSD Requirement<sup>26</sup></b>	<b>CGE&amp;Y-Supplied Test Documentation</b>
... same serving area	May not comply. Insufficient detail in the records to ascertain the serving area for the retail tests
... number of steps required... will be measured	Not accounted for in CGE&Y analysis. CLEC activities include receiving fax, locating original request for noting the reserved numbers.
... timeliness of response... will be measured	CLEC experience is two to six times longer than retail
... paired test scripts	Does not comply. Insufficient retail testing.
... coordinated to within 1 minute of each other	Does not comply. Test pairs shown to be at least 10 minutes apart.

It is obvious CGE&Y failed to properly conduct the evaluation. However, based on the evaluation CGE&Y did make, the only reasonable conclusion is that Qwest does not provide equal service to CLECs requesting reservations of large blocks of TNs.

**4. CGE&Y Failed to Determine if Substantially the Same Ability is Provided to Both the Pseudo-CLEC and Qwest Service Representatives to Query the Status of a Pending Service Order.**

Section 4.1.12, version 2.10, of the TSD requires CGE&Y to answer the following question:

Is substantially the same ability provided to both the Pseudo-CLEC Service Representative and the Qwest Service Representative to query status of a pending service order[?]<sup>27</sup>

<sup>24</sup> *Id.*

<sup>25</sup> TSD, § 4.1.(6).

<sup>26</sup> *Id.*, § 4.2 (6).

<sup>27</sup> *Id.*, § 4.1 (12).

CGE&Y failed to answer this question in its interim Final Report. Instead, CGE&Y noted that CLEC and Qwest customer service representatives both had the *ability* to query the status of a pending order.<sup>28</sup> CGE&Y failed to evaluate whether the *same* ability to query the status of a pending service order is provided to both the CLEC Service Representative and the Qwest Service Representative.

In its retesting activities, CGE&Y, via the Pseudo-CLEC, requested the status of five (5) orders via IMA GUI and to obtain the retail experience, received from Qwest an order status report for one (1) order in its system.<sup>29</sup> It made no status queries through the Qwest EDI interface. It concludes that the processes are equivalent,<sup>30</sup> but has failed to conduct any testing or observations of the process or procedure that either CLEC or Qwest representatives employ to gain the status of pending orders. CGE&Y has not conducted the proper tests as required by the TSD and comes to a conclusion that is plainly not supported by its own documentation of test activities.

The testing is supposed to determine whether the service representatives have substantially the same abilities to query the Qwest systems using the separate interfaces. This requires CGE&Y to cause the Pseudo-CLEC to effect queries through the EDI interface as well as the IMA GUI interface to receive pending order status. It also requires observation and monitoring of the Pseudo-CLEC and Qwest representatives using their respective GUI systems to determine whether the processes are equivalent in methods, interactive steps, and results. CGE&Y has looked only at the results to make its finding as to equivalence. As conducted, this is an inadequate test, and CGE&Y's conclusions are unsupported by the facts contained in its own testing results.

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<sup>28</sup> TR 385, ll. 1-8 (Aug. 8, 2001).

<sup>29</sup> CGE&Y's Document Viewing Room RPE Re-evaluation Test Results.

**5. CGE&Y Failed to Determine if CLEC and Qwest Customer Service Representatives Have Substantially the Same Ability to Expedite Due Dates.**

Section 4.1 of the TSD requires CGE&Y to answer the following question:

Is substantially the same opportunity provided to the Pseudo-CLEC Service Representative and the Qwest Service Representative to expedite due dates[?]<sup>31</sup>

CGE&Y failed to answer this question in its interim Final Report. CGE&Y merely determined that a telephone call was required for both CLEC and Qwest customer service representatives in order to obtain expedited due dates. Although CGE&Y apparently concluded that both CLEC and Qwest customer service representatives must make a telephone call to request an expedited due date, that does not mean that substantially the *same treatment* is provided once the telephone call is responded to. CGE&Y made no findings or conclusions on the relative abilities to expedite a due date once a telephone call is made to the respective centers.<sup>32</sup>

In its Retail Parity retesting, CGE&Y issued EDI orders via the Pseudo-CLEC and also had IMA-GUI orders issued with requests for expedited due dates. It similarly monitored Qwest representatives issuing orders with expedited due dates. It concludes that "the process to request an expedited due date is substantially the same for the resale representative and the retail representative."<sup>33</sup> Its testing documentation belies this opinion.

Its own data shows that all of its requests to expedite due dates for CLEC orders (*viz.*, WSNPB01007, WSNPB01003, RESL75F04R, BASL09401R, LPWP02810R, and LPWP03801R) were made and none were expedited. The test documentation shows that only one of the Qwest requests for expedited due date was successfully processed. The testing methodology appears suspect because of the significant failure rates experienced and observed,

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<sup>30</sup> Draft Final Report, § 3.1.4.3 (11).

<sup>31</sup> TSD, § 4.1 (8). *See* TSD, § 4.2 (8).

<sup>32</sup> TR 372-373 (Aug. 8, 2001).

<sup>33</sup> Draft Final Report, § 3.1.4.3 (8).

and the conclusion that the processes are substantially the same is not supported by CGE&Y's test scripts and records of testing as provided in its Document Viewing Room. The ways in which CGE&Y attempted to acquire earlier due dates was so ineffective that additional testing is required to complete the evaluation of expedited due date processes for both retail and CLEC users.

**B. CLEC Customer Service Representatives Using the IMA-GUI Do Not Receive Pre-Order Query Responses in Substantially the Same Time as Qwest Customer Service Representatives.**

When discussing the response time results for IMA-GUI transactions compared to the equivalent transactions using Qwest retail interfaces, CGE&Y found, "[t]he results clearly indicate substantial and significant *disparity of pre-order IMA-GUI response timeliness*, with resale service representatives waiting approximately three times as long for a response as retail service representatives."<sup>34</sup> CGE&Y conducted further analysis to determine if the "substantial and pervasive timeliness disparities" could be attributed "entirely to legitimate validations performed on each individually-timed query."<sup>35</sup>

CGE&Y initially found that, even after making adjustments for security validations, there were "substantial and statistically significant disparity which remains even after making the maximal possible adjustment for potential security validations and other consistent per-individual query differences between resale and retail pre-order query response timings."<sup>36</sup> CGE&Y issued AZIWO1110 covering the disparity of timings between CLEC and retail transactions. Qwest's response to the IWO asserted: "Qwest believes that the statistical differences found by CGE&Y are not meaningful." Further, "Qwest believes when taken in

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<sup>34</sup> Draft Final Report, § 3.1.4.1 (at 203) (emphasis added).

<sup>35</sup> *Id.* at 204.

<sup>36</sup> *Id.* at 208.

context of a customer contact the difference not only has no impact on a CLECs ability to compete, but is also so minimal as to pass unnoticed by the customer.” Finally, “Virtually all transaction types have demonstrated continued improvement in average resale times.”

Apparently Qwest has convinced CGE&Y to ignore the hard facts of the disparities in response time since the data continue to show that CLECs are disadvantaged by the poorer response times.

CGE&Y has also invented an amount of time that it elects to subtract from the difference between retail and CLEC query times. In the Retail Parity workshops, CGE&Y admitted that the http delay, if any, had not been calculated.

MR. FINNEGAN: Is this another one consistent with our discussion that this should impose minimal delay, but Cap did not investigate what the absolute amount of delay imposed by HTTP routing would be?

MR. DRYZGULA: Yes.<sup>37</sup>

It now cites, without quantification, that by eliminating “http timing delays” the retail and resale experiences are substantially similar.<sup>38</sup> CGE&Y must show its calculation of the http timing delay it has created and submit its work papers showing how it arrived at the factor that it used to reduce the differences between retail and resale. No records are provided in the Document Viewing Room or within the IWO documentation that support an http timing delay.<sup>39</sup>

In its Performance Acceptance Certificate (“PAC”) for IWO1110, initially issued on December 5, 2001, and subsequently issued on December 18, 2001, CGE&Y claims that, in spite of the data to the contrary, “...the figure above indicates that the experience of a resale representative performing pre-order query transactions appears to be substantially similar to that

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<sup>37</sup> Tr. 242 (August 8, 2001).

<sup>38</sup> Draft Final Report, § 3.1.4.1. (at 208).

<sup>39</sup> In its interim Retail Parity Evaluation, CGE&Y claimed that Ordering and Billing Forum (“OBF”) guidelines caused the disparity. Interim RPE at 6. The CLECs demanded that CGE&Y identify the specific guidelines that allegedly cause the disparity. CGE&Y never did identify the specific guidelines. CGE&Y no longer relies on the

of a retail representative performing similar activities using the internal OSS interfaces of Qwest.”<sup>40</sup> AT&T and WorldCom have submitted objections to the Performance Acceptance Certificate. However, it appears CGE&Y does not intend to do anything further, and the debate on the extent of disparity between retail and resale pre-order response time will go to the Commission for an ultimate conclusion, unless Staff in its recommendation draws a different conclusion.

**C. CGE&Y’s Sample Size During the Evaluation of the Timeliness of Maintenance and Repair Transactions Was Too Small to Reach Any Meaningful Conclusions.**

CGE&Y incorrectly believed it had constraints on the total sample size used in the Retail Parity Evaluation and tested with sample sizes that were too small to reach any meaningful conclusion. It admits this deficiency in the Draft Final Report.<sup>41</sup> CGE&Y further attested that its testing was inadequate when it stated:

[B]eing that we had as small a sample size as we did, we did not attempt really to come up with statistically confirmatory evidence of parity or disparity. We are only reporting the results here. There is no conclusive statement of parity or disparity with regard to M&R timeliness in a statistical sense.<sup>42</sup>

The TSD imposed the requirement for CGE&Y to conduct testing of the IMA-GUI Maintenance and Repair processes versus Qwest retail representatives interacting with the Qwest retail system for like functions. Section 4.4 (e) of the TSD directs CGE&Y to gather information, monitor the activities and record the appropriate data for the following Maintenance and Repair processes:

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OFB guidelines for the disparity. It now relies on http delay. However, once again, CGE&Y fails to provide any basis or evidence for relying on http routing for the delay.

<sup>40</sup> AZIWO1110 Performance Acceptance Certificate “AZIWO1110\_PAC\_12\_18\_01 ATT-WCom-CGE&Y-comment.doc.”

<sup>41</sup> Draft Final Report, § 3.2.4. (at 240).

<sup>42</sup> TR 336, ll. 14-20 (Aug. 8, 2001).

1. CSR Validation (query response times, quality of information provided, and number of steps required to complete the query will be observed, documented and compared for the Qwest retail interface versus IMA-GUI utilized by the Pseudo-CLEC)
2. Trouble Reported (The data required to generate a trouble ticket will be entered into the IMA-GUI. Response times, quality of information provided and the number of steps required will be observed, documented and compared for the Qwest retail interface versus IMA-GUI utilized by the Pseudo-CLEC)
3. Closed Trouble Tickets (The TA observation team will gather and compare closed trouble tickets on both the Qwest retail interface and the Pseudo-CLEC interface. Accuracy, quality and completeness of information and resolution response will be compared for the two interfaces)
4. Trouble Report Status (The ability to request and receive periodic status reports on pending trouble tickets will be compared between Qwest and the Pseudo-CLEC)
5. Expected Resolution Date (Expected Resolution Dates on pending trouble tickets will be compared between Qwest and the Pseudo-CLEC)
6. Mechanized Loop Test (MLT) (query response times, quality of information provided, and number of steps required to complete the query will be observed, documented and compared for the Qwest retail interface versus IMA-GUI utilized by the Pseudo-CLEC)
7. Retrieval of a Customer Trouble History record (query response times, quality of information provided, and number of steps required to complete the query will be observed, documented and compared for the Qwest retail interface versus IMA-GUI utilized by the Pseudo-CLEC)

Testing with sufficient volumes to support statistical analysis is a basic requirement of the OSS Test.<sup>43</sup> Having admitted that it performed insufficient testing in the workshops on the RPE, one would expect that CGE&Y would reasonably have conducted additional maintenance and repair testing in the period that followed the workshops. It did not. No additional maintenance and repair tests were conducted to evaluate the parity of representative interactions between retail and resale systems.<sup>44</sup> CGE&Y admits the results should not be viewed as evidence of disparity – they likewise cannot be viewed as evidence of parity.

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<sup>43</sup> TSD, § 9.

<sup>44</sup> Qwest ceased use of the maintenance and repair functions within its IMA-GUI system mid-year 2001 and implemented the Customer Electronic Maintenance and Repair (“CEMR”) system. Retesting would have involved use of CEMR by the Pseudo-CLEC, as was done in conducting the Functionality Testing of CEMR. *See* Draft Final Report, § 2.3.



The maintenance and repair transactions are another case of *inconclusive results* which undermine any finding of parity in the evaluation of the OSS interfaces.

**D. CGE&Y's Findings on the Quantitative Evaluation Portion of the Retail Parity Evaluation Point Towards a Conclusion of Disparity.**

CGE&Y has characterized the quantitative evaluation portion of the Retail Parity Evaluation as the counting of steps and fields necessary to complete various types of orders. CGE&Y's finding on the quantitative evaluation was that "CGE&Y found disparity in the numbers of fields and steps required for a CLEC using IMA-GUI to complete an order (including pre-order steps) versus Qwest; the numbers of fields and steps were greater, across most scenarios, for CLECs."<sup>45</sup>

CGE&Y eventually issued AZIWO1111 as a means of documenting the disparity of fields and steps that are necessary to effect pre-ordering and ordering through the Qwest systems. Qwest's response to the IWO was in several parts, but the essence of the response was that: "Qwest believes that CGE&Y is making some apples-oranges comparisons and that the statistical differences found by CGE&Y are not meaningful."<sup>46</sup> In its Performance Acceptance Certificate for IWO1111,<sup>47</sup> CGE&Y states: "The revised table shows that test case combinations 1, 2, 3, 5, 6, 7, 8, 11, 12, 14, and 15 required more data entry fields for resale than retail and that test case combination 4, 9, 10, 13, and 16-20 required more data entry fields for retail than resale." Further, "The revised table shows that, with the exception of test case numbers 4, 9, 13, and 20, all test case combinations required more steps for resale than retail to complete similar transactions."

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<sup>45</sup> Draft Final Report, § 7.2.

<sup>46</sup> AZ\_TI424\_IWO1111\_Formal Response\_7\_19\_01.doc.

<sup>47</sup> AZIWO1111\_PAC\_10\_10\_01 CGEY Response.doc.

With all of its data showing that Qwest's processes require more data and more data entry steps for CLECs to generate orders that are equivalent to Qwest retail orders, CGE&Y comes to the unsupported, and unsupportable, conclusion that CLEC representatives are not disadvantaged by the imposition of different and more onerous order entry tasks. This appears to be another case where the ultimate conclusion will be made by the Commission, unless Staff in its recommendation draws a different conclusion.

**E. Retail Parity Test Conclusion**

CGE&Y claims that Qwest is providing non-discriminatory access to its OSS based upon its quantitative, qualitative and timeliness evaluations. A close examination of each of those three elements shows significant problems, significant unanswered questions, and flawed testing methodologies. It takes much longer for CLECs to execute pre-order transactions, it takes CLECs many more steps and many more fields to create service orders, and key qualitative questions remain unanswered. Despite numerous requests by the CLECs to CGE&Y during the Retail Parity Evaluation workshop to explain how evidence that supports negative timeliness findings, negative quantitative findings and inconclusive qualitative findings can result in an overall positive nondiscrimination finding, CGE&Y never provided a reasonable explanation. Given the opportunity to perform additional testing in the re-testing period, CGE&Y failed to take advantage and report results according to requirements of the TSD and the MTP. The Draft Final Report shows that more testing is needed and demonstrates the premature nature of this Draft Final Report.

On the basis of the documented results of CGE&Y testing to date, it is AT&T's position that the evidence overwhelmingly supports a finding of discrimination. If CGE&Y's unsupported

conclusion is not addressed now, Staff will be forced to justify these deficiencies when making its recommendation on Qwest's compliance with section 271.

#### **IV. RELATIONSHIP MANAGEMENT EVALUATION**

**A. CGE&Y Failed to Perform Formal Interviews With CLECs in Compliance with TSD Requirements and Such Failure Renders CGE&Y's Findings With Respect to Account Establishment, Account Maintenance and EDI Development Suspect.**

For the CLEC Account Establishment and CLEC Account Management Evaluations, both the Master Test Plan and the Test Standards Document identify two major activities that CGE&Y must complete as part of the overall evaluation of Qwest OSS. Those two activities are (1) reviewing Qwest documentation and (2) performing interviews with Qwest, Pseudo-CLEC and CLEC personnel.

The MTP identifies the following as one of the CLEC Account Establishment Evaluation activities:

The Test Administrator will perform interviews with the Pseudo-CLEC, participating CLEC's and Qwest personnel to document the experiences encountered when establishing a new CLEC account.<sup>48</sup>

The TSD includes the following as one of the CLEC Account Establishment activities:

The Test Administrator will perform interviews with the Pseudo-CLEC, participating CLECs and Qwest personnel to document the experiences encountered when establishing a new CLEC account.<sup>49</sup>

The MTP identifies the following as one of the CLEC Account Management Evaluation Activities:

The Test Administrator will perform interviews with the Pseudo-CLEC, participating CLEC's and Qwest personnel to document the experiences encountered in regards to Responses to Account inquiries, Help Desk Call

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<sup>48</sup> MTP, § 7.2.1 (emphasis added).

<sup>49</sup> TSD, § 6.2.3.3 (emphasis added).

Processing, Help Desk call closures, Help Desk Status Tracking, Problem Escalation, Forecasting, and Communications<sup>50</sup>

The TSD identifies one of the CLEC Account Management Activities as:

*The Test Administrator will perform interviews with Pseudo-CLEC, participating CLECs and Qwest personnel to document the experiences encountered in regards to the timeliness, accuracy and completeness of Qwest responses to Account inquiries, the timeliness and responsiveness of Help Desk Call Processing, the appropriateness and methods applied to Help Desk call closures, the actual performance of Help Desk Status Tracking activities, the frequency and appropriateness of Problem Escalation efforts that are taken in response to CLEC inquiries, the reasonableness of Forecasting requests and the extent to which forecast information is applied by Qwest into its various planning activities, and communications avenues that are available to CLECs by Qwest and the extent that these are effective.*<sup>51</sup>

Unquestionably, both the MTP and the TSD required CGE&Y to perform interviews with Qwest, CLEC and Pseudo-CLEC personnel. Despite the clear requirement in both the MTP and the TSD to perform interviews with Qwest, Pseudo-CLEC and CLEC personnel, CGE&Y unilaterally decided that questionnaires were an acceptable substitute for interviews with the CLECs. CGE&Y's opening comments during the Relationship Management Evaluation Report workshop made it clear that CLECs were not formally interviewed as part of the Relationship Management Evaluation and that CGE&Y considered questionnaires as a substitute for formal interviews.

*These questionnaires took the place of in-person interviews in many instances. And the results of these questionnaires are in the room that we refer to as the viewing room and have been made available to all interested parties. In some cases we did conduct interviews, but mostly it was with Qwest personnel. And that was in their account establishment or their account management or their EDI, electronic data interchange, IMA, interconnect mediated access development group, and people who are responsible within Qwest for management of the*

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<sup>50</sup> MTP, § 7.2.2 (emphasis added).

<sup>51</sup> TSD, § 6.3.2.3 (emphasis added).

CICMP process. *Informal interviews were conducted from time to time with various CLECs, as well.*<sup>52</sup>

During the workshops, CGE&Y confirmed that it did not perform interviews with CLECs for either the account establishment or account maintenance evaluations.<sup>53</sup> CGE&Y also confirmed during the workshop that, “it was our interpretation that it was acceptable and adequate to use for those CLECs who wanted to and opted to respond to take the written responses to our questionnaire as their position.”<sup>54</sup> Even when the questionnaire responses came back and were characterized by CGE&Y as “skimpy at best,” CGE&Y did not consider following the requirements of both the MTP and TSD by conducting formal interviews with the CLECs.<sup>55</sup>

Both the TSD and the MTP directed CGE&Y to perform formal interviews with CLECs for a very good reason. The reason is that the operational folks that should have been the subject of the interviews may not have the time or the written communication skills to effectively describe their account evaluation and account management experiences through a questionnaire. AT&T cautioned its operational employees that were filling out the questionnaire to not get overly concerned about the responses because there would be follow-up interviews.<sup>56</sup> Particularly with technical personnel, face-to-face interviews or interactive interview via the telephone can be much more informative than reading from questionnaire responses.<sup>57</sup> AT&T also contacted CGE&Y when AT&T did not receive a request by CGE&Y for a follow-up interview and was informed that AT&T would not be interviewed.<sup>58</sup> AT&T finds it disturbing

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<sup>52</sup> TR 17-18 (Oct. 9, 2001) (emphasis added).

<sup>53</sup> TR 104-105 (Oct. 9, 2001).

<sup>54</sup> TR 105 (Oct. 9, 2001).

<sup>55</sup> TR 107 (Oct. 9, 2001).

<sup>56</sup> TR 106-107 (Oct. 9, 2001).

<sup>57</sup> TR 100-101 (Oct. 9, 2001).

<sup>58</sup> TR 106-107 (Oct. 9, 2001).

that even when CGE&Y received CLEC questionnaire responses that it considered to be “skimpy,” it still did not see fit to follow the MTP and TSD and perform formal interviews with the CLECs.

In December 2001, just prior to the publication of its Draft Final Report, CGE&Y conducted a series of three interviews with AT&T staff on the subject of Change Management, Contract Amendments, and EDI Interface Development. AT&T accommodated CGE&Y’s last minute effort to provide it at least some data on CLEC positions on these three TSD requirements. The interviews were conducted on December 18 and 19, all via teleconference. To AT&T’s knowledge, based on its review of documents contained in the CGE&Y Document Viewing Room, no other CLEC interviews were conducted. The more appropriate time frame for conducting interviews with the Arizona CLECs would have been while other testing was underway and the opportunity to conduct other interviews more opportune. The paucity of data gives the Commission no perspective on whether smaller, less technically oriented CLECs have access to account management resources that are suitable for entering and/or surviving in the market.

CGE&Y claimed it conducted interviews with Pseudo-CLEC personnel concerning CLEC Account Establishment and CLEC Account Management.<sup>59</sup> However, there is no evidence that CGE&Y used the results of the Pseudo-CLEC interviews to reach any of its conclusions for either CLEC Account Establishment or CLEC Account Maintenance evaluations. In describing the Pseudo-CLEC experience in the Draft Final Report, CGE&Y stated, “[t]he following summary is based upon the final report of the CLEC account establishment process given by [Hewlett-Packard], the Pseudo-CLEC for the Arizona 271

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<sup>59</sup> TR 28-29 (Oct. 9, 2001).

evaluation.<sup>60</sup> The Draft Final Report makes no mention of the results of any of the interviews with the Pseudo-CLEC. A similar absence of any indication of interviews with the Pseudo-CLEC can be found in the CLEC Account Management Evaluation sections. In describing the Pseudo-CLEC experience, the Draft Final Report states:

The summary below is based upon the following reports issued by HPC, the Pseudo-CLEC for the Arizona 271 evaluation:

- “CLEC 12-Step Process Report for 271 Test Generator” – Version 2.0
- “Help Desk Relationship Report for 271 Test Generator” – Version 3.0<sup>61</sup>

CGE&Y appears to have only interviewed AT&T staff as part of the Electronic Interface Development Evaluation, yet there are many other CLECs in Arizona that have developed EDI interfaces. As part of the Interface Development Evaluation, the MTP states:

The Test Administrator will observe the processes for design and development of an EDI interface and the processes for design, development testing and implementing an IMA-GUI Interface to the Qwest OSS. *The Test Administrator will conduct interviews with Qwest, the Pseudo-CLEC, and CLEC personnel.* This will be a cooperative process to identify, discuss, and track OSS interface development and implementation activities in progress.<sup>62</sup>

The Electronic Interface Development Evaluation section of the TSD states:

The TA will observe the processes for design, development, testing and implementation of EDI, EB-TA and Billing interfaces and the processes for acquiring and implementing an IMA-GUI Interface to the Qwest OSS. *The TA will conduct interviews with Qwest, Pseudo-CLEC, and CLEC personnel.* This will identify and track OSS interface development and implementation activities while they are in progress.<sup>63</sup>

CGE&Y admitted during the RME workshops that there were no interviews with any CLEC personnel in its evaluation of Qwest's processes supporting CLEC interface

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<sup>60</sup> Draft Final Report, § 5.1.3 (at 343).

<sup>61</sup> *Id.*, § 5.2.3 (at 361).

<sup>62</sup> MTP, § 7.2.4 (emphasis added).

<sup>63</sup> TSD, § 6.5.2.3 (emphasis added).

development.<sup>64</sup> CGE&Y also admitted during the workshops that there were no formal interviews with any Pseudo-CLEC personnel in its evaluation of Qwest's processes supporting CLEC interface development.<sup>65</sup> To remedy these deficiencies, CGE&Y made a half-hearted effort to comply with the MTP and TSD requirements and interviewed three AT&T people with EDI development responsibilities. The TSD requires interviews with CLEC personnel for the other interfaces that provide access to repair and maintenance and billing functions.

The information it developed from the Pseudo-CLEC report on its efforts to build the EDI interface was based on the Qwest EDI Implementation Guide that was in use prior to April, 2001. The Implementation Guide was restructured significantly in April, July and November, 2001. CGE&Y makes no findings on the adequacy of the current EDI Implementation Guide to meet CLEC needs for development and implementation of an EDI interface for pre-ordering and ordering. The single change made to its report on Electronic Interface Development is one paragraph in the Draft Final Report:

CGE&Y conducted interviews with CLEC personnel for EDI testing and EDI development. The perception was that Qwest's EDI testing process should become the model that all other RBOCs follow. The testing personnel were very helpful, knowledgeable, and willing to work with the CLECs. The perception of the development process supported CGE&Y's finding regarding the timeliness of the release of EDI design documentation. The CLECs are optimistic that CMP will alleviate this issue.<sup>66</sup>

CGE&Y ignores the opinions expressed by AT&T staff that the Qwest practice of insufficient lead time for releasing EDI specifications is problematic and its process of issuing EDI "Addenda" following the implementation of a new release is harmful to CLEC operations when those changes require post-implementation coding for the CLEC's interface. CGE&Y

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<sup>64</sup> TR 11, ll.7-11 (Oct. 10, 2001).

<sup>65</sup> *Id.*, at. 382, ll. 12-16.



very obviously chose to do a minimal effort to attempt to comply with the CLEC interview requirement, but its effort is transparent and self-serving.

In summary, CGE&Y was negligent in the performance of the CLEC Account Establishment, CLEC Account Management and Interface Development activities in that it performed formal interviews with a single CLEC. Had CGE&Y conducted CLEC interviews adequately and reported on those diligently, AT&T believes the conclusions that CGE&Y provides in its Draft Final Report would be much different.

**B. CGE&Y Has Failed to Provide Conclusions That Are Required by the MTP and the TSD.**

The TSD states that, “[t]he Electronic Interface Development Evaluation is an evaluation of the Qwest Interface Development and Implementation Documentation for EDI, EB-TA and Billing Activities development and IMA-GUI installation.”<sup>67</sup> During the workshop, CGE&Y admitted that it had not completed its analysis of the Hewlett-Packard findings regarding the *EB-TA Specification Report*<sup>68</sup> or the *Billing Supplement Report*.<sup>69 70</sup> Notwithstanding CGE&Y’s admission that the analysis of Hewlett-Packard’s EB-TA and Billing Supplement Reports were “a work in progress,”<sup>71</sup> and, as previously discussed, CGE&Y conducted interviews with just one CLEC, and none with the Pseudo-CLEC or Qwest personnel.

CGE&Y has shown its own growing discomfort with the adequacy of Qwest’s Electronic Interface Development Process, but fails to provide its analysis that would require it to vacate its previous lukewarm opinion. In its interim Final Report on Relationship Management, CGE&Y

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<sup>66</sup> Draft Final Report, § 5.4.2 (at 387).

<sup>67</sup> TSD, § 6.5.1.

<sup>68</sup> HP Ex. 2-6.

<sup>69</sup> HP Ex. 2-7.

<sup>70</sup> TR 194-195 (Oct. 9, 2001).

<sup>71</sup> *Id.*, at 204.

stated that, “CGE&Y found Qwest’s interface development process to be generally sound in most areas.”<sup>72</sup> Given CGE&Y failed to follow the complete set of evaluation activities prescribed in the TSD and that CGE&Y had not completed its analysis of two of the three interfaces that were subject to the interface development evaluation, it is understandable that CGE&Y wants to stay silent on the matter of the adequacy of Qwest’s processes. It cannot. The TSD requires CGE&Y to conduct the evaluations of the pre-ordering, ordering, repair and maintenance, and billing interfaces and come to a conclusion on their adequacy. With these evaluations, CGE&Y would be able to make the findings that it is required to provide on these interfaces. CGE&Y should be directed to conduct the evaluations and provide its opinion, including the bases for the opinions it reaches.

CGE&Y also fails to reach a firm conclusion on Qwest’s Account Management process, although it provides the necessary facts to support a finding that the processes are inadequate and need to be rehabilitated to meet the requirements that would enable a CLEC to effectively compete.

CGE&Y found that while the Account Management processes were generally sound, Qwest’s *contract amendment process appeared to be inconsistently followed*, based upon the experiences of the Pseudo-CLEC in the Arizona §271 proceeding and the feedback received from CLECs during the Relationship Management Evaluation. In addition, the *trouble ticket handling procedures used by Qwest’s various CLEC-facing help desks appeared to be inconsistently followed*, based upon the feedback received from CLECs and experienced by the Pseudo-CLEC during the Relationship Management Evaluation. Also, responses to *CLEC account inquiries, particularly ones dealing with billing-related issues, were not consistently provided in a prompt manner.*<sup>73</sup>

CGE&Y notes that it issued Incident Work Orders to establish the need for modifications to the processes that cause the problems that interfere with CLECs’ and their opportunity to

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<sup>72</sup> Relationship Management Evaluation, DRAFT Version 2.0, at 6.

compete with Qwest. While it closed the IWOs, the information that was provided to CGE&Y by CLECs in response to questionnaires and the one interview with a CLEC, the problems raised by CGE&Y bode ominously for the future.

In this area especially, CGE&Y was remiss in that it did not examine Qwest's internal processes and procedures to determine whether the negative experiences of the CLECs were part and parcel of the ways in which Qwest's Account Management processes have been designed to operate. Had it done so and found that the process was deficient, IWOs to correct those specifics could have and should have been issued. Since it did no such evaluations (as described in the following section of AT&T's comments on Relationship Management), CGE&Y cannot make the finding that it is required to provide. Correctly, it remains silent on providing an opinion that the Account Management process provides CLECs a meaningful opportunity to compete, and instead merely points out the significant shortcomings that survive in Qwest's processes

CGE&Y also closed an IWO related to negative Help Desk findings without a proper verification of the resolution. AZIWO1145-1 was issued by CGE&Y in response to Pseudo-CLEC findings on the responsiveness of the Qwest Help Desk to Pseudo-CLEC calls. In verifying that AZIWO1145-1 was closed, CGE&Y stated:

CGE&Y understands that Qwest is not able to directly address the specifics of these 549 calls which were handled by Qwest help desk personnel. The purpose of the IWO was to bring to the surface and document an experience that CLECs may encounter when trying to conduct business with Qwest.<sup>74</sup>

The essential elements of the IWO process are: 1) CGE&Y identifies problem, 2) Qwest fixes problem and 3) CGE&Y verifies that the problem has indeed been fixed. CGE&Y's Verification of Resolution statements for AZIWO1145-1 inappropriately reduce the three-step process to the one step of "CGE&Y identifies problem." Rather than verify that Qwest has fixed

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<sup>73</sup> Draft Final Report, Executive Summary, at 10 (emphasis added).

the problem, CGE&Y believes that simply identifying the problem and warning CLECs is sufficient. This response is antithetical to the notion of a military style test.

Evidence of CGE&Y lowering the bar for closing IWOs also exists in its “Verification of Resolution” statements in AZIWO1147. AZIWO1147 concerned the timeliness of Qwest’s Help Desk answering Pseudo-CLEC telephone calls for assistance. In closing this IWO, CGE&Y stated:

CGE&Y is satisfied that this observation was brought to light as many other CLECs may have experienced the same type of service. Since there is no way to recreate this situation, the fact that it is documented, was brought to Qwest's attention and discussed is adequate.<sup>75</sup>

Adding to the inadequacy of its management of IWOs, CGE&Y provides significant information in the Draft Final Report that highlights the lack of responsiveness from Qwest’s Help Desks. The twenty-two incidents recited in section 5.2.3 of the Draft Final Report show how Qwest failed to provide timely access to the Help Desk, did not properly respond to Pseudo-CLEC inquiries, or caused customer service affecting problems. Knowing that its IWO resolution was merely a response to the specific problems raised and not a systematic resolution of the problems that confront CLECs, CGE&Y elected to not provide a conclusion. While understandable, the failure to provide a conclusion leaves the test incomplete. CGE&Y should complete its testing, focusing some of its attention on the Qwest internal processes and procedures so it can render an opinion for the Commission’s use in evaluating Qwest’s OSS support.

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<sup>74</sup> Performance Acceptance Certificate, AZIWO1145-1 -1, Oct. 1, 2001.

<sup>75</sup> *Id.*

C. **CGE&Y Failed to Evaluate Internal Qwest Process and Procedure Documentation to Verify that its Relationship Activities with CLECs can be Consistently and Reliably Performed**

The ways in which Qwest employees interact with CLECs is logically guided by process and procedure documentation, no differently from the process and procedure documentation that guide Qwest personnel in their interactions with retail end users, prospective customers, and affiliated enterprises. These are normally referred to as methods and procedures (“M&P”) documentation. CGE&Y conducted “process evaluations” in a number of areas, but stopped short of performing analyses of the internal Qwest processes that enable the CLEC to interact with Qwest. CGE&Y reviewed Qwest documentation and its website to determine whether Qwest provides sufficient documentation so that a CLEC can conduct a particular process, but took the myopic view that the internal Qwest process would function, regardless of documented practices, processes, and procedures. The MTP (Section 7) and the TSD make special mention of the requirement for CGE&Y to conduct evaluations of Qwest processes in the Relationship Management and Functionality Tests to provide insight about these M&Ps so that CGE&Y could provide its opinion as to whether the activities of Qwest employees that interact with CLECs are sufficiently explained, documented, and practiced so that the employee activities could be considered repeatable and likely to continue to be practiced once the OSS test is completed.

- TSD, Section 3.1 Scope: “The Functionality Test is designed to provide information that the ACC can use to assess the ability of *Qwest's OSSs and processes* to provide operational functionality to CLECs.”
- TSD, Section 3.6 Functionality Test Participants: “Qwest's systems, operations, and *processes* are the basis for the test.”
- TSD, Section 6.1.1: “The evaluation will focus on the available documentation accessible to CLEC businesses, *the consultative assistance that Qwest provides* and on any additional documentation provided by Qwest to its CLEC customers.

- TSD, Section 6.1.2: “The CLEC Account Management evaluation will examine the methods, procedures and *actions provided by Qwest for managing their business relationship* with the CLECs.”
- TSD, Section 6.1.4: “This evaluation will examine the documentation, specification and *consultative assistance provided by Qwest* to CLECs for use in building an EDI interface or installing the IMA-GUI interface.”
- TSD, Section 6.1.5: “This process evaluation validates that Qwest *properly communicates its change management methods and procedures* for system performance and system updates to each of the CLECs. As part of this evaluation, *procedures to notify CLECs* of planned and unplanned system downtime will be looked at.” (Emphasis added.)

To verify the nature of the examinations of Qwest M&Ps conducted by CGE&Y, AT&T provided a series of questions to CGE&Y in the Relationship Management workshop to elicit the scope of its review.<sup>76</sup> Each of these questions was asked to determine the scope of the evaluations for specific RME areas. The general nature of AT&T’s questions is to have CGE&Y identify the Qwest internal documentation that CGE&Y reviewed which support the specific test area. AT&T further asked CGE&Y to “[p]rovide the titles, versions, publication dates and sources if they are other than Qwest. If these are available on a Qwest web site, provide the url.”<sup>77</sup> CGE&Y’s testing of Qwest’s processes and procedures was limited, by CGE&Y’s unilateral decision, to the process documentation directing CLEC interactions with Qwest. It completely ignored its obligation to evaluate both sides of the process, by leaving the Qwest M&Ps out of the picture. Asked to explain this decision in the workshop, CGE&Y conjured up the excuse that those types of analyses are beyond the scope of its role as the third-party tester.

MR. CONNOLLY: How do you know what the account manager is supposed to do in the Qwest design of an account management function? How do you evaluate whether they're doing what they're supposed to do?

<sup>76</sup> See AT&T Exs. 2-1 and 2-2; CGE&Y Ex. 2-2, Q/As 23, 24, 49, 62, 72 and 106.

<sup>77</sup> *Id.*

MR. DRYZGULA: ...We did not evaluate what they're supposed to do. We evaluated what they actually do on the basis of real experience from both the Pseudo-CLEC and the CLEC community that responded to our questionnaires.<sup>78</sup>

MR. CONNOLLY: ...On AT&T's Question 49, we asked about the internal Qwest documentation that you looked at. Internal, by that, we mean those practices, procedures, and other sorts of documentation that Qwest personnel use in working at the wholesale systems help desk or managing people at the help desk...

. . .

MR. DRYZGULA: That was not our interpretation. Our interpretation was the process documentation related to the interaction between a CLEC and whatever Qwest help desk. And that is found in this Web site.<sup>79</sup>

The evaluation of whether Qwest's M&Ps are adequate, whether they have been sufficiently documented, and whether they are routinely followed in practice has been underway in the Regional Oversight Committee ("ROC") Third-Party Test of Qwest OSS. The testing requirements being tested in ROC are identical to the process and procedure testing obligations that CGE&Y elected not to perform. The ROC MTP<sup>80</sup> at section 5.2.4 describes the Relationship Management & Infrastructure Domain of testing: "This domain is comprised of the systems, processes and other operational support elements associated with establishing and maintaining business relationships with the CLECs." In addition, section 24, "Qwest CLEC Support Processes and Procedures Review," describes the testing that is required: "These tests are designed to evaluate the systems, processes and documentation provided by Qwest for the establishment and maintenance of business relationships with the CLECs." KPMG has issued Observations and Exceptions to identify the problems that it has uncovered where M&Ps do not

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<sup>78</sup> TR 139 (Oct. 9, 2001).

<sup>79</sup> TR 261-262 (Oct. 10, 2001).

<sup>80</sup> Qwest OSS Evaluation Project Master Test Plan Version 5.0.

exist or are inadequate for Qwest employees to perform their work functions and where it has evaluated the practices of employees and found that the M&Ps are not used regularly or reliably.<sup>81</sup> These Observations and Exceptions are the types of process and procedure issues that the Arizona TSD raised as requirements, but that CGE&Y ignored. The Commission needs to have answers to the questions regarding the evaluation of the Qwest practices and procedures to determine whether the practices and procedures will be sustained when competitors interact with Qwest to establish CLEC accounts, manage CLEC accounts, and provision services to CLECs for their end users. There is a dearth of the necessary data because CGE&Y chose not to perform the necessary evaluations. It appears that Qwest did not refuse to provide the necessary documentation or that it denied access to its staff who could have explained and demonstrated its internal processes. CGE&Y failed to ask for these data, in conflict with the TSD and MTP requirements, to perform process and procedure reviews.

The Commission is left with the unanswered question as to the adequacy of the Qwest Account Management procedures.

#### **D. The Change Management Process**

The Draft Final Report contains a section on Qwest's Co-Provider Industry Change Management Process ("CICMP"), now known as the Change Management Process ("CMP").<sup>82</sup> CGE&Y was required to evaluate the CMP as part of the Relationship Management Evaluation.<sup>83</sup> As part of the evaluation, CGE&Y was required to answer a series of questions,<sup>84</sup> which are iterated in section 5.4 of the Draft Final Report. CGE&Y answers all questions in the

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<sup>81</sup> KPMG Observations 3015, 3021, 3028, 3034 and 3043 and Exceptions 3009, 3010, 3011, 3012, 3040, 3045, 3046, 3082 and 3104.

<sup>82</sup> Draft Final Report, § 5.6.

<sup>83</sup> TSD, § 6.6.

<sup>84</sup> *Id.*, § 6.6.2.



affirmative. However, it is unclear what, if any, conclusions CGE&Y actually makes in the report, based on the new statement made in the Executive Summary.

CGE&Y concludes that the CICMP represents an improvement over previous Qwest processes. A complete re-design of the CICMP process to a new Qwest CMP is in progress, and thus CGE&Y has no conclusions on the new design.<sup>85</sup>

During testing CGE&Y found the CICMP to be deficient, issuing IWOs 1075, 1076, and 1078. It only concludes the process has been improved. It makes no conclusions about the adequacy of Qwest's CMP. AT&T can only conclude that the review of Qwest's CMP is incomplete and the Draft Final Report premature.<sup>86</sup>

The CMP is an integral part of the OSS test.<sup>87</sup> Qwest finally recognized the deficiencies in its CICMP and announced its intention to redesign and implement a new CMP mid-year 2001. However, redesign is not complete. AT&T raised a number of issues regarding the re-design process in AT&T's Comments on Qwest's Brief "Status Report Regarding Change Management Process" dated December 7, 2001.<sup>88</sup> The ROC Third-Party Qwest OSS test administrator also has raised numerous observations and exceptions on the new CMP process.<sup>89</sup>

On October 30, 2001, CGE&Y issued supplemental responses to IWOs 1075, 1076, and 1078, stating that it was premature to close the IWOs. However, on December 12, 2001, CGE&Y closed IWO 1075 based only on the proposed re-designed CMP. Even CGE&Y acknowledges no agreement had been reached on the process and speculates the final process will be satisfactory to the majority of CLECs.

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<sup>85</sup> Draft Final Report, Executive Summary, at 12.

<sup>86</sup> This is another example of releasing the Draft Final Report on December 21, 2001, the scheduled release date, in spite of the affect on test quality and integrity.

<sup>87</sup> See TSD, § 6.6. Also see the FCC's explanation of the statutory requirements in AT&T's Comments on Qwest's Brief and Status Report Regarding Change Management at 2.

<sup>88</sup> AT&T Ex. 6-2.

<sup>89</sup> AT&T Exs. 6-4 through 6-10.

In summary, CGE&Y *feels* that with the collaborative nature of the re-design process, *whatever agreement is reached* on the subject of types of change requests and the process by which these requests are prioritized and noted upon will be satisfactory to the majority of the CLECs with representation at the Qwest CMP. CGE&Y is therefore recommending closure of AZIWO 1075.<sup>90</sup>

CGE&Y is no less sure about its justification for closing IWO 1078 on December 10, 2001.

The release of EDI design documents is a topic that *is being negotiated* through the CMP re-design effort. At the beginning of the process Qwest proposed that it would adhere to the OBF 2233 proposal which calls for the release of draft design documentation 66 calendar days prior to a release and final documentation 45 calendar days prior. *This topic has not reached a consensus state* among the core redesign team, but CGE&Y considers the OBF proposal to be a reasonable timeframe in which to release draft and final design documentation.

Because of the collaborative nature of the re-design process CGE&Y *expects that whatever decision is reached* as to the timeliness of EDI documentation releases will have been accepted by the majority of the CLEC community. As a result, CGE&Y is recommending closure of AZIWO 1078.<sup>91</sup>

It is obvious CGE&Y closed these IWOs based on an incomplete CMP re-design, it speculates that the final CMP will be satisfactory and imagines that it will meet the FCC's statutory requirements. It is simply premature to make any conclusions on the CMP until the process is completely designed and implemented

KPMG, the ROC Test administrator, has issued a number of observations and exceptions that parallel CGE&Y's three IWOs, but it has not been able to close these on the basis of Qwest's responses:

1. Qwest's internal OSS interface change management documentation is inconsistent and unclear.<sup>92</sup>
2. Qwest's Change Management Process (CMP) does not have documented contingency plans and/or processes to correct failures in the production version(s) of OSS interfaces.<sup>93</sup>

<sup>90</sup> IWO 1075 PAC (emphasis added). See also Draft Final Report, § 5.6 (at 430).

<sup>91</sup> IWO 1078 PAC (emphasis added). See also Draft Final Report, § 5.6 (at 421 & 432).

<sup>92</sup> AT&T Ex. 6-5. Observation 3044 (Nov. 1, 2001).

3. Qwest does not consistently employ the defined Change Management Process (CMP) to exclude CLEC-impacting system changes from point release versions of Interconnect Mediated Access (IMA) interface.<sup>94</sup>
4. Qwest Systems Change Management Process (CMP) lacks guidelines for prioritizing and implementing CLEC-initiated systems Change Requests (CRs).<sup>95</sup>
5. Qwest lacks uniform standards and processes for document management. Qwest has provided, to CLECs, documents in which one or more fundamental items of reference, such as the author, business unit, release date, page numbers, version control, assumptions, and change logs, is absent.<sup>96</sup>
6. Qwest did not adhere to its established change management process for notifying CLECs about a proposed change, and allowing input from all interested parties.<sup>97</sup>

These observations and exceptions were issued during the re-design process and demonstrate that re-design is incomplete and additional changes to the process are necessary.

The IWOs, observations, exceptions and CMP re-design raise a very critical issue that has not been addressed by CGE&Y or Qwest. The FCC has stated that in order for Qwest to demonstrate that it is providing nondiscriminatory access to its OSS, Qwest must demonstrate that it “has developed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions and... is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them.”<sup>98</sup>

As part of this demonstration, the Commission will give substantial consideration of the existence of adequate change management process and evidence that the BOC adhered to this process over time.<sup>99</sup>

Because Qwest’s re-design is a work in progress, Qwest cannot provide any evidence that it has adhered to the process over time. The FCC Common Carrier Bureau also indicated

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<sup>93</sup> AT&T Ex. 6-6. Observation 3052 (Nov. 8, 2001).

<sup>94</sup> AT&T Ex. 6-7. Observation 3066 (Dec. 11, 2001).

<sup>95</sup> AT&T Ex. 6-8. Observation 3067 (Dec. 11, 2001).

<sup>96</sup> AT&T Ex. 6-9. Exception 3093 (Dec. 11, 2001).

<sup>97</sup> AT&T Ex. 6-10. Exception 3094 (Dec. 11, 2001).

<sup>98</sup> *Bell Atlantic New York Order*, ¶ 102.

that “[t]he independent evaluation should assess the BOC’s change management process and should include, but not be limited to, a review of the BOC’s ability to implement at least one significant software release.”<sup>100</sup> The FCC requires a third-party review on one major software release after the re-design of CMP is complete.

Qwest must admit that any CMP implementation delay is caused by its own inaction. CLECs were objecting to the change management process that Qwest had in place prior to February 2001. Despite the fact that the IWOs were issued in February 2001, Qwest failed to initiate meaningful reform of the CICMP until July 2001. Any delay occasioned by Qwest’s late implementation of a properly structured CMP should be attributable to Qwest intransigence.

At the moment, the Staff can evaluate only an incomplete process. Therefore, not only is CGE&Y’s Draft Final Report premature and its conclusions speculative, the Staff should not, and the Commission cannot, realistically be expected to make a recommendation until the collaborative CMP re-design process has eliminated the remaining open issues or they have gone to impasse.

## **V. CAPACITY TEST**

CGE&Y was directed to evaluate Qwest’s OSS in the Capacity Test based on the Capacity Test plan contained in the MTP and TSD.<sup>101</sup> The Capacity Test was designed to provide information which the Arizona Corporation Commission could use to assess the capability of Qwest’s OSS to handle loads equal to or greater than those projected by the various CLEC participants for estimated volumes projected one year from the date of the running of the Capacity Test. These volumes were to be determined by CGE&Y using projected volumes

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<sup>99</sup> *Id.*

provided by both Qwest and the CLECs. The test also included a review of procedures associated with computer systems scalability and staff scalability to determine, under stated assumptions, whether Qwest's systems, operations and processes were predictably capable of handling CLEC loads in the future, both projected and unexpected.<sup>102</sup>

**A. CGE&Y Did Not Properly Track Operational Readiness Test ("ORT") Results.**

In the Arizona Capacity Test workshop, it was determined that CGE&Y did not track the results of the five ORTs performed in order to validate that all issues identified were resolved. Although many issues were identified as reported in section 4.1.3 of the interim Final Report, including incorrect test scripts created by CGE&Y, incorrect templates created by the Pseudo-CLEC, incorrect test bed setup by Qwest, and inconsistent reporting of response times, CGE&Y did not track these issues for each of the ORTs.

In accordance with the System Capacity Test Detail Plan, "The overall objective of the operational readiness test is to verify that all of the components of the System Capacity Test are in place and working in a sufficient manner to enable the test to proceed after evaluation of the results of the operational readiness test."<sup>103</sup> Without tracking the results of these issues for each ORT, CGE&Y ignored the terms of the Detail Plan and could not properly validate that any of these issues were, in fact, resolved.

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<sup>100</sup> Letter dated September 27, 1999, from Lawrence E. Strickling, Chief, Common Carrier Bureau, to Nancy E. Lubamersky, U.S. WEST.

<sup>101</sup> MTP, § 6; TSD, § 5.

<sup>102</sup> See MTP, Executive Overview.

<sup>103</sup> TSD, § 5.2.2. ("The test requirements and specifications plan for the test will be reviewed with the CLECs, the Psuedo-CLEC, and Qwest prior to conducting the System Capacity Test.") See also TSD, § 5.2.4 (a) ("A detail plan specifying the scope, approach, entrance, exit, and execution requirements for the System Capacity Test will be provided and reviewed with the Psuedo-CLEC, the CLECs, and Qwest. The TA will amend and finalize the plan as needed.").

CGE&Y failed to evaluate the results of the ORT to establish the performance from the tests. The critical facts of pre-order transaction response time and the interval within which Qwest returned Firm Order Confirmations ("FOC") for the test orders were not evaluated. Such an evaluation would have enabled CGE&Y to compare the results of the ORT with the results of the System Capacity Test. A comparison would demonstrate consistency of results between the separate tests -- a logical application of test integrity. Instead, CGE&Y did nothing. In the Capacity Test workshop, the extent to which CGE&Y ignored the ORT results became clear:

MR. CONNOLLY: [W]hat did you conclude to be the reasons that there are differences in the response time between the ORT and the Capacity Test?

MR. STROUD: We didn't conclude anything.<sup>104</sup>

AT&T Exhibits 3-7 and 3-8 show that the Pseudo-CLEC enjoyed significantly faster query response time and significantly shortened FOC intervals during the Capacity Test than were experienced in the ORT. CGE&Y did not make note of these differences and could not explain any reason that Qwest's systems performed better under increased transaction loads.

Response Times (seconds)	EDI			IMA GUI		
	Capacity Test Result	ORT* Result	% Faster Response Time	Capacity Test Result	ORT* Result	% Faster Response Time
Appointment Availability Query	5.91	11.78	199.32%	1.03	3.65	354.37%
Address Validation Query	5.24	9.91	189.12%	2.77	2.39	86.28%
Customer Service Record Query	7.57	8.58	113.34%	4.45	7.91	177.75%
Facility Availability Query	12.58	23.61	187.68%	12.37	15.61	126.19%
Loop Qualification Query	13.28	18.00	135.54%	9.11	12.35	135.57%
Service Availability Query	11.53	24.43	211.88%	6.31	12.00	190.17%

<sup>104</sup> TR 197 (Aug. 25, 2001).

	EDI			IMA GUI		
Response Times (seconds)	Capacity Test Result	ORT* Result	% Faster Response Time	Capacity Test Result	ORT* Result	% Faster Response Time
Telephone Number Availability Query	5.93	7.78	131.20%	1.58	4.57	289.24%

\* The July 16, 2001 Operational Readiness Test

	Capacity Test	July 16 Operational Readiness Test
FOC Volumes	4,393	661
% FOCs returned within 30 seconds	67.5%	0%
% FOCs returned within 40 seconds	85.6%	0%
% FOCs returned within 50 seconds	88.4%	0%
% FOCs returned within 60 seconds	99.2%	60.9%

In the Capacity Tests, FOCs were returned at an incredibly fast rate, despite the fact that volumes which were more than six times as great were being processed through Qwest's systems. Had CGE&Y conducted the ORT test results analysis required in accordance with the agreed-upon specifications,<sup>105</sup> the unexplained and incredible improvement in results would have been questioned via the Incident Work Order process and the cause of the unbelievable improvement may have been found.

In the Capacity Test workshop, the extent to which the Qwest systems were known to CGE&Y to have been changed for conducting the two tests was elicited from CGE&Y representatives

AT&T Question 37: Describe the differences, if any, in Qwest processing environments between those used for the ORT(s) and the Capacity Test.

CGE&Y Response: CGE&Y is not aware of any differences in Qwest's processing environment between the ORTs and the Capacity Test.

<sup>105</sup> Draft Final Report, Appendix P, § 7; TSD, § 5.2.2.

AT&T Question 38: Describe the differences, if any, between the Pseudo-CLEC's test transaction generators, both GUI and EDI, between those used for the ORT(s) and the Capacity Test.

CGE&Y Response: CGE&Y is not aware of any differences in the Pseudo-CLEC's transaction generators between the ORTs and the Capacity Test.

AT&T Question 39: Describe the differences, if any, between the Pseudo-CLEC's result monitoring software and reports between those used for the ORT(s) and the Capacity Test.

CGE&Y Response: CGE&Y is not aware any differences in the Pseudo-CLEC's result-monitoring software or reports between the ORTs and the Capacity Test.

AT&T Question 40: Describe the differences, if any, between Qwest's IRTM scripts between those used for the ORT(s) and the Capacity Test.

CGE&Y Response: CGE&Y is not aware any differences in the Qwest IRTM scripts between the ORTs and the Capacity Test.

AT&T Question 41: Describe the differences, if any, between Qwest's systems and interfaces between those used for the ORT(s) and the Capacity Test.

CGE&Y Response: CGE&Y is not aware of any differences in Qwest's systems and interfaces between the ORTs and the Capacity Test.<sup>106</sup>

These responses demonstrate that no known substantive changes to the manner in which pre-order and order transactions were processed in Qwest's OSS were made, to CGE&Y's knowledge. Yet, Qwest's systems are found by CGE&Y to perform exceedingly better under increased transaction loads. The intent of the Capacity Test is to determine if it is *possible* for Qwest to achieve the benchmarks set for query response and FOC response intervals. To have the results show significantly better performance under heavy loads than under light loads is counter-intuitive and it requires investigation by CGE&Y, not blanket acceptance of the results of the Capacity testing.

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<sup>106</sup> CGE&Y Ex. 4-2.



**B. CGE&Y's Analysis Demonstrated that Qwest's Calculation of PO-1 Results is Non-Compliant With the PO-1 PID and Stress Volumes Yielded Excessive Response Times for CLECs**

CGE&Y was directed by the TAG to analyze Qwest's Interconnect Mediated Access Response Time Measurement ("IRTM") tool. CGE&Y stated:

*An integral part of the Capacity Test is to collect actual response times experienced by the Pseudo-CLEC in order to compare results to those reported by Qwest during the Capacity Test using IRTM. This data will be utilized to facilitate a decision as to whether results generated from Qwest's simulated system is [sic] a true representation of pre-order transaction response times experienced by CLEC service representatives.<sup>107</sup>*

According to Qwest, the IRTM purportedly simulates pre-order response times and can be utilized as the means to determine whether Qwest is complying with the performance measurement standard, PO-1 ("Pre-order/Order Response Times). In order to confirm Qwest's assertions, CGE&Y was required to determine if the actual Pseudo-CLEC pre-order/order response times provided similar results utilizing the planned volumes for the Capacity/Stress Tests.

As an initial matter, IRTM results were captured and provided by Qwest. However, CGE&Y did not validate the results or the process employed to gather the results. As defined in the PID, one of the PO-1A and PO-1B exclusions are queries that timeout.<sup>108</sup> After CGE&Y's analysis of the results obtained from the Pseudo-CLEC and Qwest during the Capacity Test, CGE&Y determined that IRTM was designed to exclude transactions that exceeded 200 seconds in length, whether or not the query actually timed out.<sup>109</sup> During the workshop, Qwest admitted that transactions that received a valid response longer than 200 seconds would be excluded from

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<sup>107</sup> Draft Final Report, § 4 (at 257).

<sup>108</sup> Qwest Service Performance Indicator Definitions, Arizona Working PID Version 6.3, May 1, 2001, at 7.

<sup>109</sup> Draft Final Report, § 4 (at 287).

the IRTM results because the transactions were considered to be timed out.<sup>110</sup> Valid transaction responses with response times greater than 200 seconds are not transactions that have timed out, as the response provided to the CLEC's query is provided – just not very timely. IRTM transactions, which are simulations of CLEC queries, do not provide information regarding actual interaction with the system by CLEC representatives. They are simply used to endeavor to mimic what, in Qwest's view, are CLEC interactions with its systems. For CGE&Y to exclude these valid transactions as transactions that time-out is non-compliant with the PO-1 PID. CGE&Y should have generated an IWO to reflect Qwest's non-compliant measurement of the PO-1A and PO-1B results, but chose not to do so.

Regardless of Qwest's inappropriate use of the 200-second exclusion, CGE&Y determined that under stress conditions (above 150% peak load), a CLEC would experience excessive response times. In addition, during the third hour of the Stress Test, CGE&Y determined that an IRTM outage occurred. However, instead of re-running the test, CGE&Y chose to exclude the transactions for both IRTM and the Pseudo-CLEC results for that third hour period. This process eliminated CGE&Y's ability to accurately reflect what would have happened had the test been re-run and the actual results been included in the evaluation. Obviously, excessive pre-order response times could have a dramatic effect on a CLEC's ability to compete in the market.

CGE&Y's analysis of the performance of Qwest's systems under stress levels is inadequate. It fails to recognize and report as unsatisfactory performance, the extent of degradation in performance that is exhibited during the test of volumes that represented 150% of the Capacity Test volume.<sup>111</sup> CGE&Y insists that the third hour of the Stress Test be ignored

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<sup>110</sup> TR 143 & 145 (Oct. 25, 2001).

<sup>111</sup> TSD, § 5.2.2.4.

when one evaluates “at what point while increasing volumes, the performance level of Qwest’s OSS begin to deteriorate.”<sup>112</sup> And, “The results of the stress tend to reflect that pre-order response times begin to suffer once volumes reach those achieved during the third hour of the stress test.”<sup>113</sup>

CGE&Y does not explain the extremely thin differences between the transaction volumes processed in the second and third hours and fails to comment on the extent that processing ground to a snail’s pace in the third hour with a very small incremental increase in volumes over the second hour of Stress testing. The table below contrasts the volume increases from the second to the third hours against the plunge in throughput that accompanied that puny increase in volumes. This data shows that the Qwest system capacity is far less robust when all of the test data are examined, despite CGE&Y’s plea that the results of the third hour of processing should be ignored.

	Volume			Response Time		
	10:00 Volume	11:00 Volume	% Increase	10:00 Response Time	11:00 Response Time	% Slower Response Time
<b>EDI Stress Test Results</b>						
Appointment Availability Query	30	32	6.67%	8.7	65.56	653.56%
Address Validation Query	1045	1159	10.91%	6.77	63.16	832.94%
Customer Service Record Query	833	924	10.92%	9.05	64.94	617.57%
Facility Availability Query	615	686	11.54%	12.03	70.08	482.54%
Loop Qualification Query	141	159	12.77%	15.18	70.94	367.33%
Service Availability Query	280	310	10.71%	14.47	70.46	386.94%
Telephone Number Availability Query	216	240	11.11%	7.86	64.16	716.28%

<sup>112</sup> Draft Final Report, § 4.1.3 (at 288).

<sup>113</sup> *Id.*

The frightening fact of this data is that a 10% increase in volumes above those experienced in the second hour of Stress testing causes a response time drop of nearly 600%. This is very inadequate spare capacity in Qwest's systems, especially in light of the prospects for increased volumes when CLECs enter the Arizona market on a mass-market basis. CLECs would be unable to provide adequate information to prospective end users about products and services, would drag customers through lengthy waiting periods to provide answers about available appointments, available telephone numbers, or whether their local service is DSL capable.

**C. CGE&Y Has Failed to Evaluate Actual CLEC Usage of Qwest's Pre-Ordering System Against the Results Produced by the Qwest IRTM System Simulator**

CGE&Y was required to provide its analysis of the pre-ordering response times that were experienced by the Pseudo-CLEC using the Qwest interfaces to provide evidence of whether the IRTM technology provides a reflection of actual CLEC usage. CGE&Y does not meet this obligation in the Capacity Test, nor does it report on this issue in the Functionality Test. AT&T describes the Functionality Test deficiency in Section IV of these Comments.

In the Capacity Test, the Pseudo-CLEC recorded response times for pre-ordering queries made through the Qwest EDI by subtracting the date and time each transaction was sent from the date and time each transaction was received. For those transactions that did not receive a response for whatever reasons, CGE&Y removed them from its calculations. The EDI results reflect a significant disparity between actual usage and IRTM-reported usage, with a general pattern of actual usage being considerably and consistently slower than reported by IRTM.

	EDI		
Response Times (seconds)	Capacity# Test Result	IRTM* Result	% IRTM Under- reporting
Appointment Availability Query	5.91	5.86	.9 %
Address Validation Query	5.24	4.31	17.68 %
Customer Service Record Query	7.57	6.86	9.43 %
Facility Availability Query	12.58	14.67	-16.60 %
Loop Qualification Query	13.28	8.28	37.64 %
Service Availability Query	11.53	8.00	30.64 %
Telephone Number Availability Query	5.93	3.24	45.38 %

# CGE&Y Confidential Supporting Documentation, CT01.xls

\* CGE&Y Confidential Supporting Documentation, CT19, IRTMSummary8to7.xls

CGE&Y provides none of the numerical data in its Draft Final Report expressed above that would indicate that it examined actual Pseudo-CLEC usage versus IRTM usage. It comes to the unsupported and unsupportable conclusion that “[t]hese data did not refute the assertion that results generated from Qwest’s simulated system are a true representation of pre-order transaction response times experienced by CLEC service representatives.”<sup>114</sup> CGE&Y provides no empirical evidence that compares the Pseudo-CLEC’s actual data with the IRTM data so that any party could make an evaluation of the results and fails to support its conclusion with any facts.

CGE&Y has not provided the required evaluation of CLEC actual versus simulator responses calculated by Qwest.

## **VI. FUNCTIONALITY TEST**

. The Functionality Test is to provide information to the Arizona Commission to determine if the Qwest OSS adequately perform pre-ordering, ordering, provisioning,

<sup>114</sup> Draft Final Report, § 3.4.4. (at 257). *See also id.*, § 4.1.4 (at 295).

maintenance and repair, and billing functions for the CLECs.<sup>115</sup> Two major areas of focus are detailed in the MTP and in the TSD:

Verify the ability of the CLEC participants or the Pseudo-CLEC to perform the necessary pre-order activities, to submit LSRs and ASRs through Qwest's OSS which must successfully provision and install the requested service or facilities (ASRs will not be provisioned) in an accurate and timely fashion. This includes the ability to track the progress of the LSRs and ASRs through these systems, install the service or facility, observe final order completion, verify the establishment of billing records, and verify the accuracy of call records against documented test calls.<sup>116</sup>

Validate the ability of a CLEC participant to access Maintenance and Repair (M&R) systems using EB-TA. Additionally, the Pseudo-CLEC will access M&R systems using the Qwest CEMR system.<sup>117</sup>

Both controlling documents specify, in detail, testing requirements for the five functional areas of OSS support which were to be conducted by CGE&Y and reported in the Functionality Test Report. The Functionality Test workshops yielded significant facts that AT&T presents herein which reveal that CGE&Y failed to conduct all of the tests and analyses of the Functionality Test that were required and that CGE&Y came to conclusions in its interim Functionality Test Report that were not supported with sufficient facts.

In the Functionality Test workshops, CGE&Y reminded the parties that its interim Report was merely advisory in nature and that the conclusions it reached were ones that are not necessarily relevant to the Commission's conclusion on whether Qwest provides non-discriminatory access to its OSS.<sup>118</sup>

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<sup>115</sup> TSD, § 3.1.

<sup>116</sup> TSD, § 3.1. *See also*, MTP, § 4.1.

<sup>117</sup> *Id.*

<sup>118</sup> TR 30 (Nov. 27, 2001).

**A. CGE&Y Did Not Perform Tests That the MTP and TSD Require.**

AT&T's earlier submitted comments on the interim Functionality Test Report pointed out discrepancies between the testing that was to be conducted and the testing actually performed by CGE&Y. During the Functionality Test workshops, AT&T's questions endeavored to determine the omissions in testing and any/all omissions in reporting. To AT&T's disappointment, it found case after case where, despite a clear requirement to conduct certain tests and report on them, or to analyze test results and issue reports on those results, or to publish information about its testing, CGE&Y ignored the controlling documents and made no finding because it conducted no analyses or testing.

- 1. CGE&Y does not provide an evaluation of Qwest's pre-ordering system contrasted with the response times measured in PO-1, despite the requirement to do so.**

In the March 29 TAG meeting, the parties agreed that in the Functionality Test, CGE&Y would obtain information from the actual use of Qwest's pre-ordering system to determine whether the Qwest IRTM system accurately portrays the results that a CLEC would experience in terms of response time. PO-1 is the measurement that provides pre-order response time analysis against specific benchmarks for various pre-ordering types.

CGE&Y provided its analysis of the pre-ordering response times as experienced by the Pseudo-CLEC in Table 2.1.4a in its interim Functionality Test Report. CGE&Y provided this data "for informational purposes," however, and demurs from the important question whether PO-1 measured results are equivalent to those that a CLEC user of the system would experience. It inferred that its Capacity Test Report is dispositive of the question of comparability. The Capacity Test Report makes no such finding, noting only that CGE&Y believes that the testing of pre-ordering system capacity shows that Qwest can meet its benchmarks.

The Commission needs to know the answer to the IRTM versus actual usage question, and CGE&Y has failed to provide any supportable data that can answer the question. On the basis of Table 2.1.4a, Qwest missed more than 90% of its EDI Pre-Ordering benchmarks in the course of the Functionality Test.

In its Draft Final Report, CGE&Y finds a new way to duck the question: "CGE&Y finds that in spite of its earlier reservation dealing with IRTM, results do not dispute that IRTM is an adequate measurement tool to gauge pre-order response times."<sup>119</sup> No additional analysis is presented. It has presented a corrected version of Table 2.1.4a<sup>120</sup> that continues to show that nearly 80% of the EDI Pre-ordering benchmarks are missed by considerable amounts. In contrast, Qwest reports that its PO-1 results through November 2001 meet the benchmarks for response time.

Media	Query	Date	PO-1 Measure	Jan 2001	Feb 2001	Mar 2001	Apr 2001	May 2001	Jun 2001	Jul 2001	Aug 2001
IMA-EDI	AAQ	Count	10 secs	42	39	8	29	99	58		
		Avg *	PO-1 B-1	*49.1	*1,215.5	*28.4	*15.3	*17.3	*79.0		
	ASQ	Count	10 secs	43	39	6	42	111	67		
		Avg	PO-1 B-1	*1,881.5	*160.1	*12.7	*17.4	*19.8	*18.7		
	AVQ	Count	10 secs	115	396	279	327	235	89		6
		Avg	PO-1 B-4	*430.5	*18.1	*15.8	*17.6	*38.8	*53.9		*21.0
	CFAQ	Count	No Benchmark		48	4	69	15			
		Avg	PO-1 B-9		18.4	16.0	15.7	18.8			
	CSRQ	Count	12.5 secs	57	281	278	263	134	33	1	11
		Avg	PO-1 B-5	*105.0	*832.1	*14.9	*16.0	*31.2	*15.8	*21.0	*18.2
	FAQ	Count	25 secs	75	124	19	75	124	32		
		Avg	PO-1 B-3	*25.7	21.7	19.7	19.0	24.3	*40.0		
	SAQ	Count	25 secs	41	37	1	7	30	11		
		Avg	PO-1 B-2	24.7	18.2	12.0	17.0	18.4	*291.2		
	TNAQ	Count	10 secs	52	67	12	44	127	66		
		Avg	PO-1 B-6	*23.2	*16.4	*27.6	*16.1	*18.0	*286.0		
	TNSQ	Count	10 secs	39	54	9	46	131	59		
		Avg	PO-1 B-6	*20.0	*16.1	*18.2	*16.1	*18.3	*263.7		
		*	Missed the Benchmark								

<sup>119</sup> Draft Final Report, § 4.1.3 (at 294).

<sup>120</sup> Draft Final Report, § 2.1.4. During the Functionality Test workshop, CGE&Y agreed with AT&T that inconsistencies existed between Table 2.1.4a and the raw data contained in the spreadsheet used to prepare the Table. Those inconsistencies were resolved, and CGE&Y provided a corrected version of the Table in the workshop. TR 183 (Nov. 28, 2001).



**2. CGE&Y has not evaluated Qwest's EDI interfaces for integration quality despite the MTP/TSD requirement to do so.**

The MTP and TSD clearly require CGE&Y to conduct sufficient testing and evaluation to render an opinion on the extent to which pre-ordering information can be integrated with CLEC service requests. "The integration quality of pre-order and order data will also be evaluated during the functionality tests."<sup>121</sup> The CGE&Y interim Functionality Test Report was silent on the issue of pre-order to order integration. CGE&Y responses to AT&T's questions during the workshop indicated that it evaluated Qwest's IMA-GUI for integration quality, but did not evaluate the EDI interface for such considerations. CGE&Y indicated that it is conducting an evaluation of Qwest's EDI interface for integrateability, but did not have an opinion at that time. CGE&Y failed to provide its written opinion and provided no empirical data that supported its limited finding offered in testimony during the workshop.

The ability of a CLEC to integrate data from Qwest pre-order responses into an Local Service Request ("LSR") without having to translate or transform the data is critical to a CLEC using electronic interfaces, *i.e.*, EDI. When ordering requirements specify data to be entered in a certain way, the pre-ordering information should be formatted in the same way so that the CLEC's system can guide the pre-order information into the order without manual intervention. Qwest's retail ordering system is highly integrated, as was demonstrated during the course of the Retail Parity Evaluation. The reason for making the testing requirements a part of the Functionality Test was to ensure that the Pseudo-CLEC operated the pre-ordering and ordering interfaces sufficiently to enable CGE&Y to form an opinion by witnessing the ways in which pre-order and order information could be linked between the two systems.

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<sup>121</sup> MTP, § 4.1; TSD, § 3.1.

In the Draft Final Report, CGE&Y now contends: “The integration quality of pre-order and order data for IMA-GUI was found to be satisfactory.”<sup>122</sup> No explanations of methodology are provided and no indication of the types of pre-order and order queries that apparently are the basis for CGE&Y’s conclusions are provided. CGE&Y also states:

Fields are cached and are pre-populated on the LSR, or selected from a drop down menu. The following exceptions were noted:

- If a CFA was retrieved, it was not pre-populated on the Loop Service (LS) Form
- NC/NCI codes are provided on the CSR query, but are not pre-populated on the LSR form

The integration quality of pre-order and order data for EDI was determined to be dependent upon the level of development of the CLEC EDI interface.<sup>123</sup>

The following is CGE&Y’s verbatim response to the question of pre-order and order integrateability and integration quality as posed in the Functionality Test workshop: “For EDI, integration quality is determined by each CLEC’s level of development.”<sup>124</sup> CGE&Y’s documentation of its work to evaluate integration quality shows that it retested certain retail parity scripts but shows that no additional evaluation was conducted that would resolve the unanswered question of how well pre-order information can be integrated into ordering requirements. Additional evaluations would be evidenced by notations made on the test script records in the files reflecting attempts to measure pre-order query response content for quality of the data, the number of characters that data elements contain, and the extent to which the ordering requirements were actually satisfied by the query response data. No such annotations are found in the retesting materials for retail parity or functionality.

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<sup>122</sup> Draft Final Report, § 2.1.4 (at 47).

<sup>123</sup> *Id.*

<sup>124</sup> CGE&Y Ex. 4-2, Q/A 16. *See id.*, Q/A 14-16.

### **3. CGE&Y failed to conduct Billing tests required by the TSD and the MTP**

CGE&Y performed an incomplete evaluation of the Daily Usage Files ("DUF") that provide the details of calls made by the Friendlies on the lines established by the Pseudo-CLEC. CGE&Y did not evaluate the form, format and content of Qwest's DUF against Qwest's specifications to determine whether Qwest's electronic records conform to the documented specifications for DUF transactions.<sup>125</sup> As a result, there are no findings as to whether a CLEC can rely on Qwest's documentation to develop and implement a system to validate DUF provisioning by Qwest.

AT&T questioned the extent to which CGE&Y evaluated the contents of Qwest's Daily Usage Files in the Functionality Test Workshop.

AT&T Question: Describe the edit and validation activities that were conducted to ensure that the data elements provided in the DUF media were accurate and complete. Indicate the standard used to determine accuracy and completeness of the data elements. Explain the results of such edit and validation activities.

CGE&Y Response: CGE&Y used the data elements provided in the DUF to create a report that was compared to bills by BAN and TN. During the test, CGE&Y determined that the DUF were sufficient to perform billing analysis. See AZIWO2120 for descriptions of discrepancies encountered in the bill validation of the DUF.<sup>126</sup>

AT&T attempted to determine whether the data that is to be provided in the DUF, consistent with Qwest's DUF documentation was validated by CGE&Y. CGE&Y did not conduct such validations, including the verification that the type of wholesale service provisioned on the CLEC end user line is consistent with the Pseudo-CLEC's records of the type of service, *e.g.*, resale and UNE-P, provided to the end user.

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<sup>125</sup> CGE&Y Ex. 4-7, Q/A 178; TR 305 (Nov. 28, 2001).

<sup>126</sup> CGE&Y Ex. 4-7, Q/A 178.

AT&T Question #174: Provide CGE&Y's evaluation of the extent to which Qwest's supplied DUF records conform to the specifications Qwest publishes for them and the industry guidelines that apply to them. Specifically address the extent to which Qwest's specifications conform to industry standards for Exchange Message Interchange (EMI) standards. List all deviations that CGE&Y detected between the supplied records and the Qwest specifications. List all deviations that CGE&Y detected between the supplied records and the industry standards.

CGE&Y Response: A specific evaluation of the conformity of Qwest's DUF records to "industry standards" was outside the scope of the Functionality Test. During the test, CGE&Y determined that DUF records were sufficient to perform billing analysis.

AT&T also endeavored to determine the ways in which critical data within the DUF records were verified by CGE&Y.

MR. CONNOLLY: There's a field in the DUF records that's called indicator 4. Would you agree that a value of 6 in indicator 4 means that the line to place at that call is served by resale service from Qwest? And would you also agree that a value of 7 in that field means that the call was placed from a line that is served by UNE-P for Qwest?

MR. DRYZGULA: I don't know. We'll take it as a take-back.<sup>127</sup>

CGE&Y's evaluation of the Qwest DUF is insufficient and has left unanswered questions that are being asked and evaluated far more thoroughly in the ROC Third-Party OSS test, despite the fact that the testing requirements are nearly identical. The ROC Billing Tests for DUF are prescribed in the Master Test Plan for that test: "The Functional Usage Evaluation is an analysis of Qwest's daily message processing to ensure usage record types including access records (when appropriate), rated records, un-rated records and credit records appear accurately on the Daily Usage Feed (DUF) according to the defined schedule."<sup>128</sup> The test administrator has issued Exception 3037 to record the fact that Qwest's formatting of the DUF is inconsistent with documented requirements. "KPMG Consulting has noted instances where the characteristics of

the DUF records appear to be in conflict with the state of the line.”<sup>129</sup> This Exception points out that this problem, left uncorrected, would result in significant impacts: “Inconsistencies between DUF records and the account status could prevent a CLEC from accurately billing its customers, thereby denying the CLEC usage revenue. It could also result in additional effort by the CLEC to correct this issue with Qwest. In addition, the absence of appropriate access records could result in lost revenue from Interexchange Carriers for access minutes of use for calls delivered to CLEC end users.”<sup>130</sup> This Exception was issued in September 2001 and remains under evaluation by Qwest and KPMG.

CGE&Y testified that it conducted detailed examinations of Call Detail Logs versus the Daily Usage Files provided by Qwest to the Pseudo-CLEC.<sup>131</sup>

AT&T Question #187: Explain the methods CGE&Y employed to conduct validation of DUF records using Friendly call log entries. Specifically address:

- What steps were taken to locate DUF entries that were inconsistent with Friendly call log entries?
- What steps were take to reconcile each Friendly call log entry with the DUF records.
- During which months of the Functionality Test were DUF validations conducted?

CGE&Y Response: CGE&Y created DRs or IWOs when DUF entries were inconsistent with Friendly call log entries. CGE&Y used the Friendly call logs to verify usage on the DUF and bill. CGE&Y conducted DUF validations during the January to May 2001 bill periods.

CGE&Y issued IWO2120 to record the fact that “[d]uring the review of the hard copy bills to the usage captured on the DUF files, there were a number of problems encountered. The end users were provided with a Call Detail Log which they completed when they made their

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<sup>127</sup> TR 319 (Aug. 28, 2001).

<sup>128</sup> Qwest OSS Evaluation Project Master Test Plan, Version 5.0, § 19.1 (at 81).

<sup>129</sup> Qwest ROC Exception 3037.

<sup>130</sup> *Id.*

calls. CGE&Y used this to compare with the DUF to ensure that all the usage was captured. CGE&Y then compared (sic) the DUF file entries to the paper bills. The attached file is a list of the discrepancies encountered.”<sup>132</sup> Discrepancies included cases where CGE&Y expected to find call details on the DUF, but the DUF records did not contain those call details. CGE&Y and Qwest exchanged details of the calls in question and eventually CGE&Y closed IWO2120, noting: “The Friendly (sic) Call Detail Log was compared to the DUF and the DUF to the invoice. The expected records were found on each source and target document. This IWO is closed.”<sup>133</sup>

Conducting its own analysis, AT&T took a sample of ten (10) Friendly end user Call Detail Logs that showed successful placement of local and long distance calls that were dialed directly by the end users. Qwest billed the Pseudo-CLEC for the UNE-P charges for each of these end users on the April 19, 2001, bill for UNE-P services. The CGE&Y test Supporting Documentation shows that the calls were considered “successful” tests, by CGE&Y. The instructions to the Friendly End Users for making the test calls are described in Draft Final Report Appendices C and D.

AT&T’s examination of the Daily Usage Files (CGE&Y Confidential Supporting Documentation “ODUF Jan – Sep 2001.xls”) yields a far lower rate of success in Qwest’s provisioning of the call details (DUF) that correspond to the calls made by the end users and verified by CGE&Y. The sample end users made 25 calls that were to generate Daily Usage records and that should have been provided to the Pseudo-CLEC. Only 8 records were provided (32%). The failure to provide the Pseudo-CLEC with call details with which to bill its end users lies somewhere in the Qwest system or in the CGE&Y analysis of the wholesale billing process.

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<sup>131</sup> TR. 306 (Nov. 28, 2001).

<sup>132</sup> IWO 2120.

The significant disparity between calls made and calls provided for billing has not been answered by CGE&Y. It is important to note that the ROC Third-Party Qwest OSS test has yielded findings consistent with AT&T's study and the issues raised in CGE&Y's IWO2120. The ROC test administrator has issued Exceptions 3036 to identify the discrepancies between DUF contents and calls made that should be provisioned in the DUF. Exception 3036 notes: "Qwest provided Daily Usage Feed (DUF) records for 69% of the executed test calls expected to generate DUF records."

This Exceptions remains open despite Qwest's efforts to explain circumstances surrounding call processing system issues that it has offered on several dates:

	<b>Exception 3036</b>
Date Qwest Received:	09/06/2001
Initial Response Date:	09/19/2001
1 <sup>st</sup> Supplemental Response Date:	10/03/2001
2 <sup>nd</sup> Supplemental Response Date:	10/11/2001
3 <sup>rd</sup> Supplemental Response Date:	11/08/2001
4 <sup>th</sup> Supplemental Response Date:	12/21/2001
5 <sup>th</sup> Supplemental Response Date:	01/10/2002

The failure to provide DUF records for calls remains the subject of retesting in ROC.

CGE&Y's FT1 database<sup>134</sup> shows that it was required to track the processing and provisioning of 1,177 calls made by Friendlie end users. It has not shown that its tracking was performed consistent with the requirements of the TSD to "verify that the usage billed is correct and accurate."<sup>135</sup>

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<sup>133</sup> *Id.*

<sup>134</sup> CGE&Y Supporting Documentation Non-Confidential Files.

<sup>135</sup> TSD, § 3.8.1 (at 3-21).

AT&T's analysis of the end user accounts and the call record disparities in its ten-account study are presented in AT&T Exhibit 2 to AT&T's Comments. In this exhibit, the name and telephone number for each of the end users is not identified, consistent with CGE&Y's process throughout the test of maintaining confidentiality for these types of data. The Contact ID number in the exhibit is the same Contact ID number used by CGE&Y in the test. Each of the test calls in the CGE&Y FT1 database made by these users is listed. These were cross-checked against the Call Detail Logs. On the right hand side of the page are two columns, "DUF Expected" and "DUF Received." A "Yes" is provided in the DUF Expected column for each call that should appear in the DUF on the basis of the test call being placed and answered according to the Call Detail Logs. No entry indicates that no ODUF records are expected because of the nature of the call or that the call did not result in reaching the designated number or service. A "Yes" appears in the DUF Received column if the call detail was matched in the "ODUF Jan – Sep 2001.xls" file. No entry in the DUF Received column indicates that no matches were found. Exhibit 2 shows that 25 calls should have generated DUF records. DUF records were received for only 8 calls CGE&Y ignored the TSD requirement to validate Qwest's provisioning of call details that enable CLECs to bill interexchange carriers ("IXCs") for terminating calls on their networks. TSD Section 3.8.3 provides a list of eight specific billing test activities. Item (h) provides: "Support of CLEC to IXC Billing: Testing will be done to evaluate Qwest's production of originating interLATA call records to be used by the Pseudo-CLEC for IXC access billing." This testing did not commence at the beginning of the Functionality Test.<sup>136</sup>

The Pseudo-CLEC inexplicably began to receive these records in August 2001, more than eight months after testing began, and the Pseudo-CLEC was advised by CGE&Y not to

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<sup>136</sup> TR 296 (Nov. 28, 2001).



process these records into a format that CGE&Y could use to verify that the records reflected the Friendlies' end user calls to 1-800 numbers or other services.<sup>137</sup> CGE&Y's evaluation of the Friendlies' end user calls is incomplete, as there was no attempt made by CGE&Y to examine the Access DUF ("ADUF") records to be certain that the end user, call-generated ADUF records have sufficient information to enable the CLEC to bill an IXC for the access charges. Furthermore, CGE&Y has no answers to the questions why the ADUF records did not appear until August 2001, why they mysteriously began to appear, or whether they are accurate or complete.

CGE&Y's Draft Final Report contains CGE&Y's promise that it conducted the appropriate access records production process testing, albeit quite late in the game.

CGE&Y believes that the validation of the access records for billing between the Pseudo-CLEC and the IXC should be a part of the Functionality Test. Since the DUF that included access records for the Psuedo-CLEC were not available during the test period, CGE&Y conducted a separate review of these records. The results of the access validation are included in this section. Since this validation occurred outside the test period there were no IWOs or discussion with Qwest on the issues stated.<sup>138</sup>

However, CGE&Y fails to deliver. CGE&Y now contends: "Since the DUF that included access records for the Pseudo-CLEC were not available during the test period, CGE&Y is not able to provide a conclusion for this product."<sup>139</sup> Consequently, the required ADUF testing has not been conducted according to TSD Section 3.8.3.h requirements Friendlie User Call Detail Logs contain records made by the Friendlie test participants noting their efforts to make prescribed series of calls according to the protocol explained in the Draft Final Report Appendices C and D. The Friendlie User Call Detail Logs contained in CGE&Y's Document

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<sup>137</sup> *Id.*

<sup>138</sup> Draft Final Report, § 2.4.4 (at 102).

<sup>139</sup> *Id.* (at 111).

Viewing Room show that calls were made that should have resulted in ADUF records being generated as early as February, 2001, but the ADUF records were not created and provided to the Pseudo-CLEC or to CGE&Y by Qwest. CGE&Y did not recognize this deficiency and issue the appropriate Incident Work Order to cause Qwest to explain why ADUF records were missing.<sup>140</sup>

The ADUF records were not provided until August, 2001 and then were consciously ignored by CGE&Y. To this date, there has been no testing to determine that calls made by Friendlie End users to 800 services (Tests 2 and 3 per Appendix C and D) result in ADUF records, and no testing has been conducted to determine whether the ADUF records are formatted properly and that they contain information sufficient for a CLEC to bill IXC's for access services.

CGE&Y failed to conduct any analysis of Qwest's electronic billing data versus Qwest specifications and did not process Qwest's wholesale billing outputs into a billing system. AT&T asked for explanations of the testing that was done to ensure that the electronic billing media conformed to Qwest documentation in the course of the Functionality Test workshop. Separate questions were posed to the Pseudo-CLEC<sup>141</sup> and to CGE&Y.<sup>142</sup> Neither did any such processing or validation.

CLEC's design computer-based systems based on industry standards and Qwest-supplied documentation that describes the form, format, and content of the electronic records to receive and process the electronic billing media from Qwest in consideration of the volume of billing media generated. A CLEC that succeeds in entering the Arizona market would receive, at a minimum, the equivalent sizes of bills that the Pseudo-CLEC received in the course of the test. On paper, these bills are thousands of pages each month. The usage files containing call detail

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<sup>140</sup> CGE&Y may have recognized the deficiency. However, in any event, it did not issue an IWO.

<sup>141</sup> HP Ex. 4-1, Q/A 39 & 40.

records add measurably to the bill records. CGE&Y did not test to determine whether Qwest's supplied documentation is useful in building such systems. The TSD prescribes the scope of the billing test: "The Billing evaluation will determine whether Qwest is providing the CLECs with accurate and timely wholesale bills and usage data ..."<sup>143</sup> CGE&Y failed to determine whether the electronic billing data is accurate.

TSD Section 3.8.4, Exit Criteria, requires:

- a) The capture and documentation of billing information provided on the wholesale bills to the Pseudo-CLEC by the TA
- b) The evaluation of the paper and electronic copies of the monthly bills for a minimum two-month time period and the electronic copies of the daily usage file on a weekly basis by the TA.

CGE&Y has not fulfilled these requirements because it did nothing to capture the electronic billing data provided on the wholesale bills in a meaningful way and failed to require the Pseudo-CLEC to use the billing information in ways that would verify that the billing information is properly formatted and constructed.

The HIGHLY CONFIDENTIAL document entitled "HPC-CGE&Y Interface Requirements for 271 Test Generator Arizona Corporation Commission" is the specification of work to be done by the Pseudo-CLEC for CGE&Y as it relates to interface data. Its purpose is "... to describe, and get agreement on, the data to be provided to CGE&Y by HPC, and the interfaces to provide that data between the companies." Section 2.3 describes what the Pseudo-CLEC should do with Billing Data that it obtains from Qwest. No part of the "Interface Requirements" imposes a responsibility on the Pseudo-CLEC to do anything but translate the data from one format to another. No checking or validating of the data was performed according to the Pseudo-CLEC testimony in the Functionality Test workshop.

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<sup>142</sup> CGE&Y Ex. 4-7, Q/A 172-176.

<sup>143</sup> TSD, § 3.8.1.

We do absolutely no translations based on business rules. It's straight 810 or 811 into an FCIF file. No business rules apply.<sup>144</sup>

No testing of the electronic billing interfaces has been done in the entirety of the Functionality Test. No validation of the billing interface documentation published by Qwest has been done in the Relationship Management Evaluation or the Functionality Test. CGE&Y has conducted limited testing of the Daily Usage Files, limited to Originating Daily Usage Files ("ODUF"), and verification of the content of the paper bills received from Qwest.

**4. The CGE&Y Report under-reports provisioning errors made by Qwest in the implementation of Pseudo-CLEC Local Service Requests**

The CGE&Y interim Functionality Test report identifies four service implementations that were incorrectly performed, resulting in additional trouble reports issued to Qwest to correct its mistakes. In response to questioning by AT&T during the Functionality Test workshop, CGE&Y admitted that it failed to account for service provisioning errors that it detected in service validation testing;<sup>145</sup> following provisioning of unbundled loops;<sup>146</sup> and following UNE-P to UNE- Loop conversions.<sup>147</sup>

CGE&Y's response to AT&T's questions on the omitted trouble tickets during the course of the Functionality Test workshop was that it would review its testing records, identify the mis-provisioned services and provide corrected statistics in its next version of the Functionality Test Report.<sup>148</sup> The Draft Final Report continues to claim that four provisioning failures were unplanned, but in CGE&Y's FT-7 documentation, it currently shows 23 unplanned trouble conditions that it experienced, furthering the incompleteness of CGE&Y's reporting on service

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<sup>144</sup> TR 360-361 (Nov. 29, 2001).

<sup>145</sup> TR 189-192 (Nov. 28, 2001); CGE&Y Ex. 4-4, Q/A 63.

<sup>146</sup> TR 237 (Nov. 28, 2001); CGE&Y Ex. 4-5, Q/A 127.

<sup>147</sup> TR 242 (Nov. 28, 2001).

<sup>148</sup> TR 189-191, 237, 242 & 275 (Nov. 28, 2001).

provisioning failures that it experienced. CGE&Y has made no adjustment of the statistics in the Maintenance and Repair sections of the Draft Final Report, and it fails to true up the results in terms of the types of services that were found to be provisioned in error by Qwest in Figures 2.2.4b, 2.2.4c, 2.2.4d, and 2.2.4e. CGE&Y provides insufficient information in its FT-7 Supporting Document to enable another party to determine exactly which service groupings experienced the unplanned failures. Using the data available, however, based on the results that CGE&Y shows for UNE-Loop provisioning, nine additional loop failures were experienced, increasing the failure rate to over 15%. CGE&Y reports no failures for provisioning of Loop with Number Portability; however, the FT-7 data shows that 6 such services were mis-provisioned by Qwest, for a failure rate of 30%. CGE&Y does not report its experiences in implementing resale services in the same manner as it has the other services. It should provide the data so that the 6 cases of unplanned service provisioning failures can be calculated accordingly. CGE&Y has made an incomplete showing of its experiences in receiving poor service from Qwest related to the provisioning of services. With failure rates as high as it experienced, CGE&Y should also have initiated IWOs so that Qwest can correct its provisioning processes to eliminate these high failure rates.

## **5. CGE&Y Did Not Report Qwest Service Provisioning Failures**

CGE&Y admits in the Draft Final Test Report that the service validation methodology required by the TSD (“The TA will access Qwest's switch and compare feature/functionality via the IMA-GUI, Maintenance and Repair, Feature Availability function and compare the switch data to the LSR to validate the accuracy of provisioning”)<sup>149</sup> was not conducted “due to a deficiency of technical resources to translate switch output.” The Functionality Test workshop

discussion on this issue is more enlightening than the Report. CGE&Y admitted that the verification of provisioning is a critical component of testing but that it did not acquire the technical expertise necessary to conduct the verification using the Qwest GUI.

MR DRYZGULA: That's not to say that that couldn't have been done. It's also not to say that it still couldn't be done. But I can affirm for you that we do not have that expertise on the Functionality Test team assigned to the 271 exercise. Arguably, it's a threshold issue that has come up not just here and in previous testimony but in other jurisdictions.

MR. WOLTERS: What I just heard you say is it's feasible, but you just didn't have the expertise to do it.

MR. DRYZGULA: Correct.<sup>150</sup>

CGE&Y knew the TSD required it to utilize the Qwest GUI-activated process of switch validation, and it should have known from its review of process and procedures documentation that it conducted in the Relationship Management test what skill sets it needed, or needed to acquire, to evaluate the information provided via the GUI Feature Availability Function. That CGE&Y failed to acquire the resources necessary to conduct the required service validations leaves the work undone. Since the alternate method employed relies on the results of Friendlie end users to provide the validation data to CGE&Y, there is no reliable information that can be used to report that services are installed as ordered and provisioned by Qwest..

**B. CLECs Cannot Issue Subsequent Local Service Requests Until Qwest's Customer Service Records are Updated To Reflect Qwest's Processing of the Original Request.**

The method employed by Qwest within its systems to identify customer records utilizes a telephone number format (10 digits representing area code, central office code, and line number) plus an additional, three-digit identifier known as Customer Code ("CusCode"). When a new

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<sup>149</sup> TSD, § 3.7.5.4.

<sup>150</sup> TR 194 (Nov. 28, 2001).

end user record is established in Qwest's systems, an internal process assigns the CusCode, which then is appended to the end user's Account Number (*i.e.*, the telephone number), so that the "full Account Number" used to verify order activities, customer contact processes, billing functions, and requests for customer service records, is comprised of the thirteen digits. The CusCode is recorded within Qwest's system. To effect the processing of update and change activities against the end user account, Qwest's system requires an exact match between the full account number provided in the update activity and its database records. If the update transaction does not match the telephone number and customer code in the Qwest database, the update transaction will be rejected from Qwest's system.

The amount of time that it takes Qwest to update its databases reflecting completed service orders is targeted to be within three to five business days. This means that the status of the end user's access to the Qwest network can be different during the period between the change in the Qwest network and the updating of the Qwest CSR database. CGE&Y found that the update interval was not universally three to five days, and also found that the consequences of out-dated customer records were significant. CGE&Y issued IWO2060 and IWO2101 to have Qwest address these problems. The Pseudo-CLEC also experienced the problem of delayed updates of customer service records, noting in its Final Report "US WEST can take up to 30 days to update the Customer Service Code (CSR) of a converted customer (one that belonged to US WEST and was converted to a CLEC). In the ROC Third Party Test of Qwest's OSS, the test administrator experienced delays consistent with the 30-day interval to have CSRs updated. In Exception 3028, item 2.1, the test administrator notes: "KPMG Consulting requests documentation to verify that updates to CSRs may take up to thirty days to be posted." Qwest responded on September 19, 2001 "Updates to CSRs may take up to thirty days to post." This

Exception remains open. The delayed CSR update issue created schedule impact on the Retail Parity Test because the TA required confirmation of the updated CSR before starting the test.”<sup>151</sup>

When CLECs issue service requests to Qwest to effect migrations of Qwest retail end users to CLEC services, such as UNE-P, the migration order’s full account number must match exactly to the retail end user’s records in the Qwest databases. If there is no match, the request cannot be processed as issued. Such a request is made to migrate the end user services to the UNE-P “as specified,” meaning that each service and feature that the end user wants to use, or continue to use, must be identified on the CLEC LSR so that provisioning of each of those service elements will be done “as specified.”

For these migration requests, Qwest “disconnects” the retail service using the service order that is derived from the LSR matching the existing retail end user record, including CusCode, and it “connects” the UNE-P service with the same telephone number as for the retail service, but with a new, different, CusCode, that Qwest internally assigns. The CLEC’s records reflect the account number with the prior CusCode, but it does not have access to the new CusCode until after Qwest updates the CSR database to show that the end user is served by the CLEC and has the “specified” services and features installed. The “new” CSR will identify the new CusCode and will show the CLEC as the service provider.

Until this cycle of events has completed, the CLEC cannot obtain new service information from Qwest’s databases unless it can determine the CusCode. Attempts to process a CSR request using the old CusCode, or no CusCode will result in the CSR for the Qwest service and not the CLEC service. For CLEC end users that make a request immediately after the migration order is processed to change their new services, add features, change directory listings, or request additional lines to be installed, the CLEC cannot format the LSR for issuance until it

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<sup>151</sup> Final Report for 271 Test Generator, Final Release 2.0, December 21, 2001, § 7.1.



obtains the new CusCode from Qwest. The only way to learn the new CusCode is through account inquiries to the Qwest databases on a daily basis to find out when the customer service record updates have occurred.

CGE&Y found how difficult this manner of working with Qwest's systems is and it issued IWO2060 to record those impediments to good customer service.

... when the rep. attempted to enter a change order, the system returned the error message "Not authorized to retrieve CSR". Numerous other accounts encountered the same message or the account was still showing "LIVE" for Qwest, which impacts the ability to process change orders when required.<sup>152</sup>

In its attempts to issue subsequent changes after the completion of the migration order, the Pseudo-CLEC's orders were rejected because they did not find an exact match in Qwest's databases. The error messages were confusing because they did not specifically identify the reason for the rejection, adding to the Pseudo-CLEC's frustration. Qwest made system changes to more accurately describe the nature of the mis-match rejects, but did nothing to enable subsequent orders to be processed when the only part of the account number that did not match was the CusCode. Once again, the CusCode mismatch occurs because Qwest changes the CusCode when it provisions the migration order, and the CLEC cannot find out what the new CusCode is until after Qwest updates its CSR database.

CGE&Y issued IWO2101 because of the difficulties it experienced by submitting CSR queries and the inability to gain access to the CSR reflecting CLEC services.

During the analysis of a customer trouble the CSR of the account was reviewed. The Reseller ID field was blank on the CSR instead of the correct reseller ID of H08.<sup>153</sup>

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<sup>152</sup> IWO 2060.

<sup>153</sup> IWO 2101.

CGE&Y's acceptance of Qwest's solutions as being adequate for these problems shows its naiveté. Apparently, if it understood exactly what the cause of the order or CSR query mismatch was, Qwest had effected a good solution. CGE&Y failed to realize that it still could not issue orders until the database updates had been made. It could not access the proper CSR until it had the new CusCode. These work-arounds perhaps caused CGE&Y to adjust its testing plan to accommodate the update delays. But if CGE&Y had translated the problems into CLEC terms, it would have realized that a CLEC that has to tell an end user that it cannot accept a service request because its customer records are not available would not appear to be a very competent CLEC. This is exactly the image Qwest would want conveyed about its competitors.

In accepting Qwest's solutions to IWO2060 CGE&Y verified the following:

- (1). After the Service Order Completion (SOC) is posted, the Customer Service Record (CSR) is appropriately updated with the current Reseller ID (RSID) and Status *within the established time interval* appropriate for this activity.
- (2) The *improvement to the error messages may decrease the time CLECs spend on investigating the cause of the error*, and therefore decreasing the amount of time in creating an LSR or change order. The new error messages contain the exact mismatched fields (e.g. Ownership Error – ACT is C and Account is Qwest Owned) which may assist the CLEC in determining the cause of the error. CGE&Y believes that the *new error messages are a significant improvement from an accuracy perspective.*<sup>154</sup>

CGE&Y's retesting to resolve this IWO consisted of 11 LSRs, for which it determined that Qwest updated CSRs within three to five days. This was the only standard that CGE&Y deemed appropriate, according to its Performance Acceptance Certificate for IWO2060. CGE&Y did not retest to determine if it could issue subsequent orders according to the CusCode the Pseudo-CLEC has on record. It issued order supplements that were intended to effect changes to the migration orders prior to their being processed in Qwest's systems. The retest did

not determine whether the change in CusCode had an impact on the Pseudo-CLEC's ability to issue orders after the processing of migration orders.

Qwest convinced CGE&Y that if it could change the ways the Pseudo-CLEC was attempting to place the subsequent orders, the problem would go away.

If the co-provider has been notified that the conversion service orders are complete, this message simply indicates that the CSR has not yet been updated in the Qwest systems. The normal interval to update POTS CSRs for both wholesale and retail accounts is *three to five business days*. IWO2060.

In its re-testing of the issues surrounding IWO2101, CGE&Y did not (nor did the pseudo-CLEC) successfully place a migration order and attempt to secure the customer code or service provider number the next day. It performed CSR queries for Pseudo-CLEC accounts that had been established via service orders that had been completed between September 27 and October 11, 2001, to determine that Qwest showed the proper service provider number associated with the account. Its records do not show when it issued the CSR queries; it merely reports that the queries were successfully processed, returning the CSR with the correct service provider identified. CGE&Y's supplemental testing documentation provides records for only four of the seven re-tests it claims to have conducted for IWO2101.

CLECs are severely disadvantaged when they attempt to provide post-migration services to end users because of the time delays built into Qwest's processes that add appreciably long periods to the CSR update cycle. The expected three to five day delay imposes a competitive burden on CLECs that is unfair and one that should be removed to enable CLECs to effectively compete. CLECs cannot place orders when the CSRs that are necessary as a foundation for an order are delayed in being updated. The three to five day waiting interval is "best case," and

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<sup>154</sup> IWO 2060 Performance Acceptance Certificate (emphasis added).

lengthier delays have been experienced in the Arizona test, in the ROC test, and in other state testing conducted by AT&T.

The processes by which Qwest “disguises” newly converted CLEC UNE-P end users with changed CusCodes further prevents CLECs from having access to records maintained by Qwest for the CLEC end users. This practice impairs CLECs from serving customers in the immediate periods following migration to CLEC services, when end users are most likely to place follow-on requests to their service providers.

CGE&Y failed to treat these issues with the gravity that is appropriate and has failed to show that the solutions implemented by Qwest for the detected problems are adequate.

**C. CGE&Y Failed To Recalculate Qwest Reported Results Using Pseudo-CLEC Data as Prescribed in the TSD**

The MTP imposes a series of requirements for CGE&Y to independently calculate Qwest’s performance results to verify that Qwest’s reporting is accurate and complete. Section 8.5.3 of the MTP states:

During Functionality Testing and Capacity Testing, Qwest will provide appropriate performance measure data and results. The Test Administrator will verify such data and incorporate the results into the Functionality Testing and Capacity Testing. The Test Administrator will acquire and/or develop data, calculate Functionality and Capacity test results, and validate results of Qwest, Pseudo-CLEC and CLEC analyses.

Also, the TSD provides guidance to CGE&Y to use the Pseudo-CLEC data to recalculate the results that Qwest produced for the test Pseudo-CLEC:

Using the raw data (before exclusions) from Qwest, the TA will perform an independent calculation of all measurements with a "Yes" indication in the MTP Appendix C and will also perform an independent calculation of

the same measurements for the same orders using the Functionality Test Data provided by the Pseudo-CLEC.<sup>155</sup>

According to CGE&Y, it is unable to comply with these requirements for a variety of reasons, not the least of which is the absence of Pseudo-CLEC data that would be required for such recalculations. It is unclear what data has not been captured, and AT&T expects to get clarification on the gaps between the data that are required for recalculation and the data that have been captured during the Functionality and Capacity Tests. Any data that have not been captured raise the specter of non-conformance with basic exit criteria for the OSS Test.

Section 3.7.5.5 Functionality Test, Ordering Exit Criteria (b), states: "The Pseudo-CLEC has provided the required data for each test script to the TA." Section 5.2.5 System Capacity test Exit Criteria (d) states: "All of the data associated with the System Capacity Test has been captured and retained by the Pseudo-CLEC." If these criteria have not been achieved, the Functionality Test is to continue and the Capacity Test run until the Pseudo-CLEC has provided all the necessary data to CGE&Y. In its Draft Final Report, CGE&Y recognizes that it has deviated from the MTP and TSD requirements to recalculate the performance results. It also claims that data necessary to recalculate results were not *provided* to the Pseudo-CLEC. It is not clear what efforts, if any, were undertaken by CGE&Y or by the Pseudo-CLEC to acquire the data necessary to fulfill the obligation for the Pseudo-CLEC to provide the data to CGE&Y.

Section 8.5.3 of the MTP requires the calculation of the same performance measurements calculated from Qwest ad hoc data using independently gathered data to validate the ad hoc calculated results (see also Appendix C of the MTP). Exclusions for each performance measurement are defined in the PID; however, many of these are based on data elements not transmitted to the Pseudo-CLEC (e.g., rate zones, exclusions, dispatch status, flow-through). Thus, Functionality Test data captured by the

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<sup>155</sup> TSD, § 7.3.4 (at 7-8).

Pseudo-CLEC are insufficient to calculate the performance measurements.<sup>156</sup>

In the Functionality Test and Data Reconciliation workshops, CGE&Y reiterated that it had not been able to use data captured by the Pseudo-CLEC to re-calculate the results provided by Qwest using Pseudo-CLEC raw data. The data captured by the Pseudo-CLEC was insufficient for certain of the measurements, according to CGE&Y. It did not seek modification of the TSD or the MTP when it decided that it could not fulfill the recalculation requirements. It makes no special mention of its failure to comply with the guiding provisions of the test specifications that serve to square Qwest's reporting of results with independently calculated results. It makes no showing of the specific data, types of data, or categories of data that it failed to capture to perform the recalculation. CGE&Y unilaterally decided to forego the required testing and elected to re-publish Qwest's results. All of the section 2.5 calculations that reflect Pseudo-CLEC results are flawed since they are not independently calculated by CGE&Y using Pseudo-CLEC raw data.

CGE&Y was asked to prepare supporting documentation that explains, for each Appendix C metric, the data elements that it did not obtain from the Pseudo-CLEC and that it alleges, required it to substitute Qwest ad hoc data for the original calculations of Pseudo-CLEC results. CGE&Y provided one version of such documents, which proved insufficient. The provision of this information to the TAG is expected prior to the Draft Final Report workshop. AT&T reserves its right to supplement these Comments following its review of the CGE&Y documentation.

In discussing its data reconciliation efforts, CGE&Y stated:

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<sup>156</sup> Draft Final Report, § 2.5.3 (at 116).

To the extent that the data reconciliation uncovered any *material discrepancies* between the two data sources, CGE&Y *adjusted* the Qwest adhoc data to reflect the performance observed by the Pseudo-CLEC. CGE&Y then used this "*corrected*" adhoc data to calculate performance measurement results for the Pseudo-CLEC and included these results in §2.5.4. Those performance measurement results using "*corrected*" adhoc data are identified in §2.5.4.<sup>157</sup>

CGE&Y's use of the terms "material discrepancies," "adjusted," and "corrected" all scream for the issuance of an IWO to reflect that Qwest is inaccurately reporting its performance measurement results data and that Qwest should rehabilitate any data affected by the problems. The TSD states:

The TA will compare Qwest's computed z statistics and other calculations to TA computed z statistics and other calculations (from Qwest's provided raw data) and to TA computed z statistics (from Functionality Test Data collected by the Pseudo-CLEC). *Discrepancies in the calculations will be evaluated, documented and reported by the TA.*

*Problems discovered requiring work by Qwest, will be entered on Incident Work Order forms and forwarded to the TAG for subsequent prioritization and submittal to Qwest for repair.*<sup>158</sup>

From a review of section 2.5.4 of the Draft Final Report, it appears that the BI-2 Invoices Delivered Within 10 days PID was the only PID where CGE&Y met its obligation to reconcile Pseudo-CLEC and ad hoc data. CGE&Y identified a problem in that Qwest was reporting 100% success in delivering invoices within 10 days and the Pseudo-CLEC results showed only a 92.56% success rate.<sup>159</sup> CGE&Y identified the problem in AZIWO1211. CGE&Y concluded that Qwest's reporting of the Pseudo-CLEC's BI-2 results were inaccurate, recalculated Pseudo-CLEC results using Pseudo-CLEC raw data and closed the IWO. The problem with CGE&Y's approach is that it did not require Qwest to correct any BI-2 results that were affected by the problems it identified in the IWO.

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<sup>157</sup> Draft Final Report, §2.5.3 (at 116) (emphasis added).

<sup>158</sup> TSD, §7.3.4 (at 7-8) (emphasis added).

Qwest's response to IWO1211 was essentially that it has been counting as an "invoice delivered within 10 days" those invoices for which it knew, through the receipt of a failed transmission notice, that, in fact, the CLEC did not receive the invoice. Only a monopoly would pat itself on the back for sending an invoice even when it knew the invoice was never received. Qwest should have been required to recalculate its prior BI-2 results counting as a miss any invoice for which Qwest received a failed transmission system notice and subsequently did not resend the file within the 10 day standard. Instead, the parties are left with inaccurate, Qwest BI-2 results for the entire CLEC community. These inaccurate results inflate Qwest's BI-2 results and make it look like Qwest's performance is better than it really is.

**D. CGE&Y's Presentation Of Results From Re-Testing Is Inconsistent With Its Presentation On Test Results. Because Re-Testing Is To Demonstrate That The Original Problem Is Fixed, Similar Analytical Methods Should Be Applied And Demonstrated**

AT&T notes that in the Draft Final Report,<sup>160</sup> CGE&Y laid out a sensible, comprehensive, and objective set of criteria for making a judgment of parity, disparity, or non-determination based on statistical data. It appears that these criteria were applied in a consistent fashion to the Functionality Test performance data. CGE&Y points out that it issued an IWO in those cases where resolutions of the underlying issue required additional data, process and procedure documentation, or a correction to a system or process.

Only through a close and careful reading of the individual IWO documents can it be determined that the resolution of the IWO has caused Qwest to take corrective action that would be expected to improve measurement results on retest. CGE&Y must identify in the Final Report the improvements or corrections that were found by it to resolve an IWO. It appears that

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<sup>159</sup> Draft Final Report, §2.5.4 (at 183).



retest results are often markedly better than the original Functionality Test results, but without an indication of system performance improvement, there is an absence of data to show that original tests and retests were done in a consistent manner.

Second, unlike the original statistical analysis, the analysis of retest data is not done using the same set of criteria as originally used to discover the disparity. Instead, CGE&Y appears to use a totally *ad hoc* approach. For example, in some cases CGE&Y simply states that aggregate CLEC results appear similar to retail results (*e.g.*, OP-4C Centrex 21). In other cases, the numerical values of results are cited along with the statistical difference of log data and concomitant *p*-values (*e.g.*, OP-4C UNE-P). Sometimes retest results reflect new Pseudo-CLEC data (*e.g.*, OP-3D ISDN-BRS), and more often it consists of only commercial CLEC data (*e.g.*, OP-4B Business). Sometimes Pseudo-CLEC and commercial CLEC data are combined to increase sample size (*e.g.*, MR-4C UNE-P), and sometimes they are not (*e.g.*, MR-3C UNE-P no dispatch). Sometimes data are combined across strata (*e.g.*, MR-3A UNE-P Dispatches within MSA combined with MR-3B UNE-P Dispatches outside MSA), and sometimes they are not (*e.g.*, MR-3C UNE-P). AT&T is particularly troubled by the inconsistent approach to retesting, especially because retesting is meant to ensure correction of statistically proven disparity.

AT&T recommends that the same rigorous criteria and analysis approach that CGE&Y applied to Functionality Test data be applied to retest data and that it be reported in exactly the same manner.

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<sup>160</sup> Draft Final Report, § 2.5.4.

**E. Contrary to Test Design, Conclusions Of Parity Are Being Made Less Frequently On The Basis Of Pseudo-CLEC Data Than Commercial CLEC Data**

When the TAG was planning the OSS Test, it was generally accepted that the test could take advantage of third-party testing benefits:

- a. forward-looking testing can be performed by providing Pseudo-CLEC test orders at statistically meaningful volumes when commercial CLEC order volumes are too low for statistical testing.
- b. Data integrity can be better ensured on Pseudo-CLEC controlled test orders than on uncontrolled commercial CLEC orders.

These two advantages, combined with the Performance Measures Audit, resulted in many system improvements and correction of errors in Qwest's performance reporting system and calculations.<sup>161</sup> However, AT&T suggests that with respect to parity determination, rather than functionality verification, the two advantages of third-party testing appear not to have been gained in the Arizona test.

AT&T has tallied the final disposition of each row of nearly all the tables in the Performance Measurement section of the Draft Final Report where parity with retail is the standard, *i.e.*, 133 findings. Not included in the tally are measures where sufficiently large sample sizes would be impractical to achieve or control for any third-party tester, for example, the OP-6 measures of various types of delay days. AT&T also acknowledges that its tally may not be entirely accurate due to the frequent need to guess about what CGE&Y intended as its final disposition. This uncertainty about what was intended is due to CGE&Y's presentation style, particularly where retesting was involved. Of the 133 cases, parity was based on the analysis of Pseudo-CLEC data in only 37 instances, and only twice was a parity conclusion based exclusively on Pseudo-CLEC retest data. In 52 cases, parity was determined using

commercial CLEC data, and 8 more parity determinations are based primarily on commercial CLEC data collected during retest. In 27 cases, no final determination was made because of insufficient data to attain statistical significance. In 7 cases, a disparity result was never clearly resolved even after retesting. Thus, the Pseudo-CLEC data, which should have the highest integrity, was generally in such low volumes that determinations had to be made much more often using commercial CLEC data. Further, in 20% of the cases, no determination was made because of insufficient data from either data source. These represent unused opportunities to take advantage of the Pseudo-CLEC ability to achieve requisite sample sizes.

<b>Conclusion</b>	<b>Measures</b>
Parity on the basis of Pseudo-CLEC data	37
Parity on the basis of Pseudo-CLEC retest data	2
Parity on the basis of Commercial CLEC data	52
Parity on the basis of Commercial CLEC retest data	8
Insufficient Data	27
Disparity not resolved	7
Total	133

AT&T has cause to question the validity of the data being used by CGE&Y to declare parity. Parity standard comparisons were examined for cases in which significant statistical results were obtained in the analysis of both Pseudo-CLEC log transformed data and aggregate CLEC log transformed data. AT&T was able to identify 40 such cases. In ten (25%) of those cases the tests disagreed, and in the remainder of the cases, the tests agreed. If both Pseudo-CLEC data and aggregate CLEC data are equivalent representations of the same process, as they

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<sup>161</sup> By its own count, CGE&Y issued more than 220 IWOs during the OSS Test and Performance Measures Audit. Draft Final Report at Appendix B

should be, then the tests disagreed far more often than should be expected given that each test presumably had less than a 5% chance of being wrong due to random influences.

If disagreement occurs more often than expected from random influences, AT&T suspects that a systematic bias is present in one or both of the data sets. If Pseudo-CLEC data is the most valid, AT&T does not believe commercial CLEC data should be used to determine parity in more than 60% of the 99 cases (out of 133 cases) in which parity was the final determination.

AT&T agrees that the Arizona OSS Test has been helpful in getting Qwest to make improvements in the areas of functionality and performance, but the tests are generally inadequate for the purpose of determining parity. Too many of CGE&Y's conclusions of parity are not supportable by the evidence presented through interpretation of the test results.

AT&T has found that the information presented in tabular form in section 2.5 is far more communicative, consistent and complete than the information on retests presented in paragraph form. Therefore, AT&T believes that inserting new rows in the existing results tables to present the results of each retest situation will improve the understanding about what final determination was made and how it was made. In the table below, AT&T has made changes to one of the CGE&Y tables to illustrate the value of these minor additions to the CGE&Y report.

2.5.4.1aaa – MR-6A – Mean Time to Restore (Hours:Minutes) - Dispatches within MSAs (Y/MY)					
Product	Standard	o-CLEC-Results	re-CLEC-Results	o-CLEC-CLEC vs. Standard	re-CLEC vs. Standard
Business	: 06:09 : 11:01 31135	: 6:16 : 08:59 : 8	: 06:00 : 10:33 1012	og: Insuff Evid 18, r0=.480, rd=.225  : Indeterminate -> P =-.133, rd=.118	Log: Parity d=-.021, rd=.000  Arith: Parity d=-.031, rd=.000
Residential	: 08:57 : 14:26 61237	: 10:46 : 13:05 : 7	: 07:22 : 11:30 3405	og: Insuff Evid 74, r0=.322, rd=.385  : Indeterminate -> P =-.090, rd=.160	Log: Parity d=-.184, rd=.000  Arith: Parity d=-.196, rd=.000
(POTS)	: 08:36 : 14:04 92373	: 07:53 : 11:57 : 9	: 10:15 : 15:00 47	Indeterminate -> P =-.082, rd=.135  : Indeterminate -> P =-.141, rd=.100	Indeterminate -> DP =0.165, r0=.130  h: Indeterminate -> P =0.062, rd=.063
(POTS) test	g: ? : 13:45 : ?	Data	g: ? : 11:26 357	No Data	Log: ? d= ?, r0= ?  Arith: Parity d=-.247, rd=.000

In AT&T's example, question marks (?) have been inserted where CGE&Y should provide data so that retest results are reported at the same level of rigor and completeness as Functionality Test data. AT&T also recommends that highlights be added to the "parity," "disparity," "Indeterminate," or "Insufficient data" terms that apply to the final determinations of CGE&Y. The highlight should be in the cell that presents the statistical test result that is key in the determination. As reflected above, this emphasis is helpful in interpreting the results.

**F. CGE&Y's Calculation Of Pseudo-CLEC Results Using Qwest's *Ad hoc* Data Are Suspect Because Qwest's *Ad hoc* Data Has Been Found To Be Improperly Calculated By Liberty Consulting Audits**

The Liberty Consulting Group ("Liberty") performed data reconciliation work for several measures at the behest of the Commission Staff and its consultants, using data related to Arizona commercial results. In connection with Liberty audits of Colorado and Nebraska commercial

data, Liberty has made findings that conflict with those reported by Liberty for the Arizona data.<sup>162</sup>

In the Colorado Report, Liberty found “[s]everal process errors [which] significantly affected Qwest’s reported performance results.”<sup>163</sup> Liberty also states that it has a concern about the “number of apparent human errors that occurred in the processing of AT&T LIS trunk orders.”<sup>164</sup>

These findings are based on the Qwest *ad hoc* data that CGE&Y uses to develop its findings in section 2.5 of its Draft Final Report. The Qwest *ad hoc* data that CGE&Y relies upon are suspect, since the data evolve from the same defective processes. Qwest has made the point that there is a single process for all states. Liberty notes in its Colorado Report that “Qwest has indicated that there should not be differences among the states in its region as to how data are collected and processed for reporting performance measures.”<sup>165</sup> Because of these detected and reported process failures to date, CGE&Y’s continuing reliance on the Qwest *ad hoc* data for its determination of results casts doubts on the credibility of CGE&Y findings. It is not yet clear the extent to which these deficient Qwest processes affect results reporting for other services, as the Liberty audits are ongoing, but the fact remains that LIS trunk orders were the basis for the finding that the Colorado results are unreliable.

In its Arizona Report, Liberty made no meaningful findings on whether Qwest properly assigned the customer miss code for LIS trunk orders. In the continuing analysis of the Colorado OP-3 LIS trunk data, Liberty found significant problems with how Qwest was assigning jeopardy codes and customer-miss exclusions. In the Colorado Report, Liberty concluded that, “21

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<sup>162</sup> Liberty is conducting data reconciliation work for results from Minnesota, Oregon, Utah and Washington. AT&T is concurrently filing a brief on the Liberty Report.

<sup>163</sup> Colorado Report at 4.

<sup>164</sup> *Id.*

percent [of the differences between Qwest and AT&T results] were likely caused by Qwest's errors in assigning jeopardy codes and customer-miss exclusions."<sup>166</sup> Liberty's analysis of Colorado OP-4 data for LIS Trunks shared many of the same findings as the OP-3 results. In addition, Liberty found that Qwest was making significant errors in its calculation of intervals for the orders that it did include in the OP-4 results. Liberty found that "[o]ne third of the numerator discrepancies were caused by errors in Qwest's application date."<sup>167</sup> Liberty also concluded, "[t]hus, Qwest cannot always support the application times it used in developing the performance results for OP-4."<sup>168</sup> Liberty also found that Qwest was inappropriately excluding from the calculation of the OP-4 measurement results any service order not completed within eight months.<sup>169</sup> The Arizona OP-4 PID does not permit Qwest to exclude orders that are completed after eight months. It is clear that these Liberty findings undermine CGE&Y's use of Qwest ad hoc data in the calculation of OP-3 and OP-4 measures in Arizona.

In Nebraska, Liberty found that that Qwest had improperly recorded the mean time to repair ("MTTR") for a significant percentage of trouble tickets."<sup>170</sup> Liberty found this error rate to be "significant." Based upon that finding, Liberty concluded that, "[t]he reported results for MR-6 for April and June 2001 are incorrect."

The specific problem that caused the excessive intervals was an incorrect MTTR recording of the close time of the trouble ticket. While Liberty's finding was limited to the MR-6 results, an inaccurate recording of the trouble ticket close time will also affect the results for the MR-3 Out of Service Cleared within 24 hours, MR-4 All Troubles Cleared within 24 hours, and MR-5 All Troubles Cleared within 48 and MR-9 Repair Appointments Met measures.

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<sup>165</sup> *Id.*

<sup>166</sup> *Id.* at 8.

<sup>167</sup> *Id.*

<sup>168</sup> *Id.*

Liberty's Colorado and Nebraska findings have called into question the accuracy and reliability of Qwest ad hoc data. There is also the possibility that other new findings and conclusions may be reached after Liberty has completed the analysis of Minnesota, Nebraska, Oregon, Utah and Washington results.

**G. CGE&Y Failed to Maintain Daily Logs.**

The TSD document provides specific reporting requirements for the TA, or GCE&Y.

The TA daily report will be updated at the end of each workday. It will include information from the daily log (Appendix D) regarding observations made during that day. The daily log will consist of the following fields:

- a) TA Tracking Number
- b) Purchase Order Number (PON)
- c) Process Area (Functionality)
- d) Process Sub-Area (e.g. UNE-P Residence)
- e) Transaction Media
- f) Date Submitted
- g) Date Completed
- h) Pending Status
- i) FOC Received Date
- j) SOC Received Date
- k) Expectations Met/Missed
- l) Comments

The specifications are defined in the following sections.<sup>171</sup>

One of the entrance criteria of the pre-order phase of the Functionality Test was daily logs were to be set up to document observations.<sup>172</sup> Pre-order activities included "Retrieve test scripts scheduled for execution each day and enter on daily tracking logs."<sup>173</sup> The TA was also supposed to "Collect completed test scripts from the Pseudo-CLEC and enter results on the daily

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<sup>169</sup> *Id.* at 7.

<sup>170</sup> ROC Observation 1028.

<sup>171</sup> TSD, § 3.7.1. *See also*, TSD, § 3.7.4.2(d): "The daily pre-ordering responsibilities of the TA consist of: ... (d) Providing test script results for input into the daily tracking log."

<sup>172</sup> TSD, § 3.7.4.3(b)(6).

<sup>173</sup> *Id.*, § 3.7.4.4(a).



tracking log.”<sup>174</sup> Finally, the pre-order criteria specifically require validation that “All daily logs have been completed.”<sup>175</sup> Similar requirements are reflected in the other portions of the Functionality Test.

AT&T began requesting copies of the daily logs shortly after the Functionality Test began. AT&T also attempted to obtain test data in a format conducive to data retrieval and analysis. It was not until the Functionality Test workshops that CGE&Y admitted that there were no daily logs.

CGE&Y met with CLECs, Staff and the Commission’s consultants to define a process whereby CLECs would receive information about the progress being made in the Functionality Test *i.e.*, the Daily Test Logs. It was agreed that CGE&Y would provide records of each day’s Pre-ordering, Ordering, Provisioning, and Maintenance and Repair transactions on a weekly basis, two weeks after the end of each testing week. In the CLEC meeting in March 2001, AT&T outlined specific information that it required for its review of the Daily Test Logs. CGE&Y was instructed by Staff to develop the Daily Test Logs according to AT&T’s requirements.<sup>176</sup> CGE&Y failed to implement the changes to reporting format despite the requests to make the changes and implement them.

CGE&Y failed to deliver the CLEC Daily Test Log reports on time and failed to deliver the information about the testing that it agreed to provide. Rather than providing each day’s ordering transactions, CGE&Y provided the status of the last update to the LSR as of the end of the testing period being reported. This denied CLECs the requisite information to track the life cycle of an LSR, as the intervening transactions, including supplements, rejection notices,

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<sup>174</sup> *Id.*, § 3.7.4.4(e).

<sup>175</sup> *Id.*, § 3.7.4.5(e)

<sup>176</sup> It should be noted that, at no time, was CGE&Y relieved of any obligation to comply with the TSD requirements regarding the daily logs.

confirmation notices, and status changes, were not provided. The pre-ordering transaction data were provided in early June only for the period of January 5 to May 16, 2001, and the information provided only enabled CLECs to examine the response time for the transactions and not the completeness, accuracy, or relationship of pre-order steps to order processing steps. CGE&Y provided repair and maintenance transactions information only for the period of May 15 to July 16, 2001, in the report provided to CLECs in early August. This data was also untimely and not formatted to enable CLEC detailed analysis of the results of maintenance and repair testing. CGE&Y reneged on its obligation to provide the Functionality Test records.

Test Results Dated From:	To:	Due to CLECs by:	Date Received:
March 02	March 08	March 22	May 21
March 09	March 15	March 29	April 19
March 16	March 22	April 05	April 19
March 23	March 29	April 12	April 22
March 30	April 05	April 19	April 22
April 06	April 12	April 26	May 8
April 13	April 19	May 03	May 8
April 20	April 26	May 10	May 25
April 27	May 03	May 17	May 25
May 04	May 10	May 24	July 26
May 11	May 17	May 31	July 26
May 18	May 24	June 07	July 26
May 25	May 31	June 14	July 26
June 01	June 07	June 21	November 9
June 08	June 14	June 28	November 9
June 15	June 21	Jul 05	November 9
June 22	June 28	Jul 12	November 9

The failure to maintain the daily logs undermines the integrity of the entire Functionality Test. The Daily Logs were designed to be the method that CLECs would be able to monitor the progress of the testing, in an efficient and non-intrusive manner. Qwest was able to monitor the

progress of the testing by whatever manner of monitoring it conducts, or chose to conduct during the course of the OSS Test. CLECs had no such visibility without the Daily Logs. AT&T complained throughout the conduct of the Functionality Test that its ability to analyze test results against its own experiences was being hampered by the absence of current information about the status of testing. The failure to maintain the daily logs undermines CGE&Y's findings and conclusions.

AT&T is concerned that Draft Final Report reflects that the exit criteria for pre-ordering <sup>177</sup>-- that all daily logs have been completed -- has been met when, in fact, CGE&Y has testified that there are no daily logs. CGE&Y also reaches conclusions prior to the closure of related IWOs. This is premature, to say the least. However, the TSD explicitly provides that the closure of all IWOs is an exit criterion of the Functionality Test.<sup>178</sup>

## **VII. CGE&Y FINDINGS AND CONCLUSIONS**

CGE&Y claims to present a summary of its findings and conclusions in the Draft Final Report Section 7. In actuality, it is a misrepresentation of facts and a distortion of the information otherwise provided in the Draft Final Report. CGE&Y also reaches conclusions in this section that are above and beyond other material presented in the earlier interim Reports, in any of the workshops, in supplemental documentation circulated with the Draft Final Report or made available in its Document Viewing Room.

The shocking and disappointing inaccurate information contained in this section must promptly be exposed and expunged.

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<sup>177</sup> TSD, § 2.1.4.

<sup>178</sup> See, for example, TSD, § 3.7.5.5(i).

## A. Performance Metrics Results

CGE&Y asserts that measures it has evaluated have resulted in parity of performance for the OSS Test. This is flat wrong in many cases because CGE&Y makes the parity claim for measures and disaggregations that are diagnostic, that have performance standards that are set as benchmarks, and others that have parity for some disaggregations and specific standards for others. These overstatements are inconsistent with the PID for the test (Version 6.3) and with the results CGE&Y provides in its Draft Final Report.

	<i>CGE&amp;Y finding</i>	<i>PID 6.3 Standard</i>
<b>Pre-Order</b>		
Pre-Order/Order Response Time	None *	Benchmark
Electronic Flow-through (PO-2)	Parity	To Be Determined
LSR Rejection Notice Interval (PO-3)	Parity	Benchmark and To Be Determined
Percent LSRs Rejected (PO-4)	Parity	Diagnostic
FOC Timeliness (PO-5)	Parity for Some Disaggregations	Benchmark
Work Completion Notification (PO-6)	Parity	To Be Determined
<b>Order</b>		
Installation Commitments Met (OP-3)	Parity for Some Disaggregations	Parity, Diagnostic, and Benchmark
Installation Intervals (OP-4),	Parity for Some Disaggregations	Parity, Diagnostic, and Benchmark
New Service Installation Quality (OP-5)	Parity for Some Disaggregations	Parity and Diagnostic
Delayed Days (OP-6)	Parity for Some Disaggregations	Parity and Diagnostic
Coordinated Hot Cut Interval (OP-7)	Parity	Diagnostic
Coordinated Cuts On Time (OP-13)	Parity	Benchmark and Diagnostic
<b>Maintenance and Repair</b>		
Out of Service Troubles Cleared Within 24 Hours (MR-3)	Parity	Parity and Diagnostic
All Troubles Within 48 Hours (MR-4)	Parity	Parity and Diagnostic
All Trouble Cleared Within 4 Hours (MR-5)	Parity	Parity and Diagnostic
Mean Time To Restore (MR-6)	Parity for Some Disaggregations	Parity and Diagnostic

	<b><i>CGE&amp;Y finding</i></b>	<b><i>PID 6.3 Standard</i></b>
Repair Repeat Report Rate (MR-7)	Parity	Parity and Diagnostic
Trouble Rate (Percent) (MR-8)	None *	Parity and Diagnostic
Customer and Non-Qwest Related Trouble Reports (MR-10)	Parity	Diagnostic
<b>Billing</b>		
Time To Provide Recorded Usage Records (BI-1)	Parity	Parity and Benchmark
Billing Accuracy (BI-3)	Parity	Parity and Benchmark
Billing Completeness (BI-4)	Parity	Parity and Benchmark

\* CGE&Y is required to make a finding on these measures because they are reflected in Appendix C of the MTP with a “Yes” indication for either Functionality or Capacity Testing.

#### **B. General Functionality Findings**

CGE&Y continues to make unsubstantiated and intentionally misleading claims. It states that “Gateway down-time was minimal during the test.”<sup>179</sup> In IWO1198, CGE&Y noted that its records of gateway down-time showed significant periods of time where the Pseudo-CLEC could not access the Qwest gateways. The Pseudo-CLEC recorded more than three times the outage time than did Qwest. The IWO was resolved when Qwest pointed out that, while the Pseudo-CLEC may have experienced the outages, it failed to report them to Qwest, so the Qwest records of outages would have to stand, despite experience to the contrary. It is unclear from CGE&Y’s statement in section 7 of the Draft Final Report whether it is relying on the experience of the Pseudo-CLEC or Qwest in making its claim on minimal down-time. At the very least, CGE&Y should show the amounts of down-time reported by both parties and allow the reader to reach a conclusion on how much production time was lost due to the unavailability of the gateways.

CGE&Y claims that “bill rating and charging for test accounts was processed without error.” The bills at issue are likely to represent the same bills that were inadequately verified in the Functionality Test, as explained in AT&T’s comments on that section of the Draft Final Report. It does no good for CGE&Y to lend an air of accuracy and completeness to billing data that it failed to verify and that continues to show failures in ongoing testing in the ROC.

“The format of pre-order reports was clear and understandable.” There is no basis for this remark, as there is no such thing as a pre-order report. Nowhere in the MTP, the TSD, or any system of the Draft Final Report can one find a reference to a pre-order report.

### **C. Retail Parity Findings**

#### **1. IMA-GUI Pre-Order and Order**

CGE&Y’s Retail Parity summary points out parity between CLEC and Qwest retail operations; however, its findings contrast with the evidence garnered in the conduct of the test; *i.e.*, the process of issuing orders for equivalent products and services demonstrates that the Qwest CLEC interfaces impose significantly higher burdens of work than required by Qwest retail representatives. CGE&Y evaluated the number of data entries and steps that the Pseudo-CLEC and Qwest representatives perform to issue orders and found the discrimination that has been designed into the CLEC interfaces. CGE&Y’s evaluation of the amounts of data required from CLEC representatives show conclusively that Qwest has made these tasks more onerous for CLEC representatives working with the IMA-GUI system than for Qwest representatives performing those tasks. CGE&Y’s evaluation of the comparative response time for CLEC users and Qwest users provides empirical evidence that Qwest representatives obtain faster answers to queries than do CLEC representatives using the IMA GUI interface.

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<sup>179</sup> Draft Final Report, § 7.1 (at 463).

By its application of exogenous factors to its findings -- factors that are ill defined, imprecise, and arbitrary, CGE&Y asserts that the net result is parity. For the requirement to enter more data and step through the ordering process, CGE&Y invents and closes IWO1111 on the rationale that “only 15% of the fields required for POTS were manual entry for CLECs.”<sup>180</sup> The issue to be addressed is whether the work to enter orders is more onerous for CLECs representatives than Qwest representatives. CGE&Y identifies the disparity in its IWO1111, but inexplicably denies the facts and finds that parity exists where the facts show disparity.

For the system response time analysis, CGE&Y documents the fact that the access to ordering functions, including pre-ordering, is slower for CLECs than for Qwest representatives during the critical carrier-to-customer conversations that may result in the carrier placing an order for the customer’s service. Yet, to make a finding of parity, it must make adjustments to erase the differences in system response time. So, it creates a fictional amount of time called the “http timing delay” to be used to reduce the difference between CLEC access and Qwest access. It does not quantify the “http time delay,” nor does it explain the methods it applied to calculate it, if indeed it was calculated. It advises of this quirk in its thinking within IWO1110, and carries it forward in this section of the Draft Final Report.<sup>181</sup>

Both of these adjustments that cause CGE&Y to make findings of parity are unsupportable and should be rejected.

## **2. IMA GUI Maintenance and Repair**

CGE&Y’s evaluation of the equivalence of the repair and maintenance functions between those available to Qwest representatives and to CLEC representatives via the IMA-GUI is a dated and obsolete evaluation. The IMA-GUI capabilities that it relies on to make its finding of

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<sup>180</sup> *Id.*

parity are no longer available, having been retired nearly a year ago. These functions were removed to a different system, as noted by CGE&Y in its report, but the evaluation of whether the new system provides equivalent ways for CLEC representatives to interact with Qwest systems for repair and maintenance functions has not been performed. Once Qwest migrated its CLEC access to the CEMR system, CGE&Y should have undertaken the work to evaluate whether it provides equivalent access to repair and maintenance functions for CLECs and Qwest retail. It has not done so, and the findings that CGE&Y makes are not supportable by a system that exists today.

#### **D. Capacity Test Findings and Conclusions**

Because CGE&Y repeats many of its conclusions on the Capacity Test and Stress Test in this section of the Draft Final Report, AT&T believes it is necessary to also repeat its objections to the CGE&Y conclusions here. These remarks are brief and are intended to point out the major flaws in CGE&Y's summary statements.

##### **1. CLEC Actual versus Qwest's IRTM Results**

As provided in AT&T's earlier comments on the CGE&Y Capacity Test section of the Draft Final Report, CGE&Y has ignored a specific requirement to advise the Commission whether pre-order query response time actually provided to CLECs via the EDI interface is equivalent to the response times reported by Qwest in PID PO-1. CGE&Y has failed to make this analysis, despite adequate data obtained from the Capacity and Functionality Tests that it has developed. It shies away from the obligation by concluding that Capacity Test results show that the EDI pre-ordering results are consistent with the benchmarks for the measurement. It fails to

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<sup>181</sup> See *infra*, at 13-15.



focus on the disparities in response time that show Qwest's simulator significantly understates query response time in contrast to actual CLEC usage of the electronic interface.

Instead of answering the TSD-specified question, CGE&Y invents an alternate analysis, that is not called for in either the MTP or the TSD; namely, are the IRTM results and CLEC actual experience within the benchmarks established for PO-1. The Draft Final Report is incomplete without CGE&Y's finding as to the equivalence of pre-order response time as measured by CLEC actual EDI experience and Qwest's IRTM-reported results.

## **2. Unexplained Superior Performance in the Capacity Test**

The fact that CGE&Y did not conduct a diligent pre-test regimen of monitoring the processing of "get-ready" transactions through Qwest's systems comes back to haunt the Commission at this late date. Qwest's Capacity Test performance is nothing short of miraculous, by the results developed by CGE&Y, which show that the greater the transaction load that is placed on Qwest's systems (up to a point) the faster it processes them. AT&T labeled these pre-order query and FOC generation phenomena "counter-intuitive" because they fly directly in the face of the underlying objective of the Capacity Test. It is intended to determine the point at which system performance *degrades* under load conditions. Yet, during the Capacity Test, Qwest's systems outperform any other testing of substantially lesser volumes, according to CGE&Y. Because CGE&Y did not monitor Qwest's processing results, as did AT&T, CGE&Y does not find it unusual that pre-order queries are returned between 113% and 354% faster under volume test loads and that seven times more FOCs were returned in less than 30 seconds under those heavier volumes than were provided in the test preparation stages. Despite AT&T's multiple requests for CGE&Y to evaluate the reasons for these extraordinary results, CGE&Y continues to congratulate Qwest and itself on the Capacity Test results.

### **3. Stress Test Results**

AT&T has shown that CGE&Y's reasoning for ignoring the poor system performance during the Stress Test (150% of the baseline volumes) is unsound. Qwest's systems performed miserably during the third hour of the Stress Test and yet, CGE&Y wants those results to be excluded from the analysis.

If EDI transaction intervals obtained during the third hour of the test are excluded from the results, as *in CGE&Y's opinion should be the case* only to compare the results to the IRTM results (see discussion of AZIWO2119 in Section 4.1.3.1), the resultant average response times would then be within the PID benchmarks and comparable to results achieved by IRTM.<sup>182</sup>

The data AT&T supplies in its analysis shows that with small increases in volumes between the second and third hours of the Stress Test, Qwest's processing production plummets to glacier speed. In the fourth hour the loads are returned to the levels of the second hour and performance returns to those same second hour levels. Clearly, the third hour volumes are the break point, and AT&T's analysis shows how close those volumes are to the threshold of system breakdown. The fact that Qwest's systems operate so close to the edge of malfunction should be a CGE&Y concern; but instead, it insists that those shortcomings be covered over.

### **E. Relationship Management**

CGE&Y soft-peddles its evaluation of the ability of Qwest to develop and maintain account relationships with CLECs, finding that some key processes are "satisfactory" and others are under development. CGE&Y hopes those changing processes are eventually implemented fairly, successfully, and eventually operate such that CLECs have reasonable opportunities to

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<sup>182</sup> Draft Final Report, § 7.3 (at 466) (emphasis added).

compete. AT&T comments in the earlier sections on Relationship Management demonstrate the inadequate testing that CGE&Y conducted, and failed to conduct.

The most significant process within the Relationship Management test which CGE&Y finds under development is the Qwest Change Management Process. It reports that Qwest began to redesign and re-deploy the process in June, 2001, after CGE&Y made its initial findings that the existing CICMP was deficient in several areas. The process deficiencies continue to exist, but CGE&Y provides no information as to the extent to which the new process has been implemented.

At the time of this Final Report, CGE&Y has observed that this [Qwest-CLEC community] collaborative effort is in the process of addressing all of the deficiencies that CGE&Y identified in its evaluation of Qwest's CICMP process, plus other deficiencies identified by the CMP redesign process.<sup>183</sup>

The CMP has not yet emerged. The CMP has not been used to guide the implementation of a significant software release. In its September 29 letter to U S West's Ms. Nancy Lubamersky, the Common Carrier Bureau Chief at the time, Mr. Larry Strickling, writes to advise that meetings between U S West and Bureau staff have been held "to provide guidance on important elements that a third-party test should include to assist our determination that a BOC is providing nondiscriminatory access to its OSS." In its section of the letter on Change Management Process, Mr. Strickling tells CGE&Y what its assessment should consider: "The independent evaluator should assess the BOC's change management processes and should include, but not be limited to, a review of the BOC's *ability to implement at least one significant software release*." AT&T placed this letter on the record in this case, most recently as Exhibit AT&T 5-2, December 12, 2001. Any claim by CGE&Y that the Qwest CMP is sufficient is premature; any

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<sup>183</sup> Draft Final Report, § 7.4 (at 467).

claim that it will be found sufficient is speculative. The evaluation of the CMP should, at minimum, include the requirements outlined by the Common Carrier Bureau, and contained in the approving FCC decisions on section 271 applications of Verizon and SBC.

## **VIII. CGE&Y RECOMMENDATIONS**

CGE&Y provides an Executive Summary for the Draft Final Report. At the end of the Summary, CGE&Y, without explanation, provides 10 high priority recommendations, 3 medium priority recommendations, and 3 low priority recommendations.<sup>184</sup> The issuance of the recommendations undermines CGE&Y's conclusions that Qwest provides CLECs nondiscriminatory access to its OSS and conflicts with military style ("test to you pass") testing, which is a foundation of the Arizona OSS test.<sup>185</sup>

First, neither the MTP nor TSD provide that it is the role of the Test Administrator ("TA") to provide recommendations. The MTP fully delineates the roles of the TA and providing recommendations is not one of them.

Second, the testing was suppose to be conducted as a military style test. This means the test is conducted until Qwest passes. The MTP and TSD were developed through a collaborative process. If the test was conducted properly in conformance with these documents, recommendations to improve Qwest's OSS would not be substantive.

Third, in spite of CGE&Y's findings and conclusions that Qwest provides CLECs nondiscriminatory access to its OSS, CGE&Y finds it necessary to make *10 high priority* recommendations, some of which are inconsistent with its findings and conclusions in its Draft

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<sup>184</sup> Draft Final Report, Executive Summary at 12-13.

<sup>185</sup> See the Test Exception Process at MTP, § 2.2.1.

Final Report. If a problem requires a recommendation that it be fixed, it should have been fixed before CGE&Y issued its conclusions.

Fourth, the recommendations confirm what AT&T has been stating all along – CGE&Y has not conducted the test in conformance with the MTP and TSD. Not only are the recommendations not contemplated by the TSD and MTP, the recommendations are necessary only because CGE&Y did not comply with the MTP and TSD.

**A. High Priority Recommendations**

High	CGE&Y recommends that Qwest audit the PID structure and compare it to the proposed national standard. CGE&Y also recommends that annual audits be conducted on all measures based on a quarterly schedule to guarantee the continued accuracy of Qwest's Performance Measurement reporting.
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CGE&Y recommends that Qwest audit the PID structure and compare it to the proposed national standard for Performance Measures, assumably, the proposal in the FCC's Notice of Proposed Rulemaking on this subject. CGE&Y also appears to suggest that Qwest is the appropriate party to "audit the PID structure" on an ongoing basis.

This is an absurd suggestion, and its classification as a High Priority suggestion raises concerns regarding the reliability of CGE&Y's PMA. Perhaps the more telling observation is CGE&Y's recommendation that the audit it conducted of Qwest's performance measurements system be re-performed each year. CGE&Y was to conduct an audit with sufficient diligence and structure to ensure that the processes employed by Qwest are institutionalized and reliable

and, more likely than not, are repeatable operating practices administered by effective and efficient procedures and processes.

Conducting such an audit was within the scope of the Performance Measures Audit prescribed by the MTP and the TSD. Furthermore, preparing the existing PID to proposed natural standards serves little purpose.

High	Qwest should develop an automated process that would allow CLECs to view internal service orders generated by Qwest for CLEC owned accounts, whether the service order was initiated as a result of a service request from the CLEC, or by an internal Qwest activity.
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Had CGE&Y conducted the Functionality Tests sufficiently to utilize Qwest's Pending Service Order inquiry process, and if it had issued the appropriate Incident Work Orders for the Retail Parity Test, it would not be making this recommendation. In the Retail Parity Test, CGE&Y finds that a CLEC's ability to inquire into the status of its orders and the derivative Qwest service orders is different from the ability to perform those functions enjoyed by Qwest retail representatives, and makes the incredible claim that Qwest provides its retail representatives with information that is less satisfactory than to CLEC representatives. "It is CGE&Y's finding that both the resale and retail representatives have substantially the same ability to status a pending order, but the quality of information returned to the resale representative is more clear and concise than that which is returned to the retail representative."<sup>186</sup> Notably, CGE&Y does not comment on the procedural aspects of effecting the pending order status query or the timeliness of the response from Qwest's systems.

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<sup>186</sup> Draft Final Report, § 3.1.4.3 (at 233).

Moreover, CGE&Y provides no information that indicates that it conferred with Qwest service representatives to *determine the extent to which they are impeded by the order status information* provided to them. Its records (Document Viewing Room) show no interviews with representatives of either Qwest or CLECs for purposes of evaluating the pending order information.

Had CGE&Y conducted the appropriate Retail Parity and Functionality testing of order status queries, it would have found the process and the results deficient and it should have issued Incident Work Orders to cause Qwest to undertake system and process modifications that would “allow CLECs to view internal service orders generated by Qwest for CLEC owned [sic] accounts.” The process corrections would have been done in the course of the OSS Test and would have presented CLECs with the equivalent access to Qwest order information that is the subject of this High Priority Recommendation.

High	Qwest should receive approval from a CLEC prior to performing any changes to a CLEC owned account. This would apply to any changes that are Qwest initiated. Currently, these activities are shown as “Completions” on a Loss and Completion Report, but little detail is provided, causing undue confusion.
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While the full meaning of its recommendation is unclear, CGE&Y appears to be concerned about the access Qwest representatives have to records of end users who are served by competitors, such that these records can be affected by changes not related to service orders issued by the CLEC. The implication is that those changes can be made without CLEC authorization and to the detriment of either the end user or the CLEC.

CGE&Y is in a position to have visibility into the means and modes of access that Qwest representatives actually have, regardless of Qwest-documented practices and procedures that

advise employees against taking such actions. During the Test, CGE&Y could have, and according to the TSD, should have, observed Qwest representatives conducting their tasks in support of CLEC ordering, provisioning, maintenance, billing and account management. In earlier comments, AT&T points out that CGE&Y failed to evaluate Qwest internal processes, but had it done so, it could be far more precise in its recommendation as to its concerns that Qwest's representatives have unfettered access to CLEC end user records.

Any access to end-user records that places Qwest in a position that cannot be enjoyed by a CLEC, is an advantage that Qwest holds as the incumbent. It needs to have access to records to update them on the basis of legitimate, CLEC-specified requests, or requests by the end user. No other access should be possible.

High	CGE&Y recommends that Qwest develop and publish clear standards that would enable CLECs to use the Firm Order Confirmations. These standards should clearly differentiate the Firm Order Confirmation, Jeopardy Notice, Reject notices, and all other notifiers.
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CGE&Y experienced significant problems with Qwest's Firm Order Confirmation process, alternately dubbing it "Follow-On Communication," since a Qwest-issued FOC is not a confirmation or a commitment. Qwest responded to these IWOs with explanations of how its processes and procedures worked and under what circumstances the documented process would be available and some indications of the situations where other processes would serve to override the norm. CGE&Y's typical analysis of Qwest's practices was not to examine them in the form of Qwest methods and procedures (these were available to CGE&Y as the Test Administrator but are not available to CLECs) claimed to be proprietary by Qwest. The extent



of retesting as explained in the following excerpt from the Draft Final Report (at 75) was for CGE&Y to issue the corresponding orders to see if the problems recurred.

During testing it was determined that FOCs are used by Qwest for purposes other than confirming the order. When a CLEC receives a FOC, they expect a Due Date to be confirmed. If multiple FOCs are received changing the status of the order (i.e., Due Date change, Jeopardy condition, Reject message), a CLEC must manually interpret the impact of this status change on the order processing. CGE&Y created several IWOs addressing this issue:

- AZIWO1107: Involved 13 test cases that received an unsolicited FOC with a Due Date change. CGE&Y determined that this was a Qwest training opportunity. During re-test no additional occurrences were observed. The IWO was closed.
- AZIWO1114: 1 FOC received with two different Due Dates. CGE&Y determined that this was a Qwest training opportunity. The IWO was closed.
- AZIWO2115: 4 FOCs were identified (3 after the SOC) where the FOC communication was being used for miscellaneous comments that may or may not require action by the CLEC. CGE&Y determined that this was a Qwest procedural issue. Qwest implemented a new procedure in September, 2001. This IWO was closed.
- AZIWO2116: The Pseudo-CLEC received a FOC prior to the complete editing of the LSR. Qwest implemented edits earlier in the process to improve FOC reliability. The IWO was closed.
- AZIWO2069: An order was submitted via EDI and a FOC was not received. CGE&Y determined that this was a Qwest training opportunity. Upon receiving FOCs for 31 retest orders submitted via EDI CGE&Y closed the IWO.

No systematic analysis of Qwest's practices was undertaken. No verification that the changed sequences of edits and validations were incorporated into the work processes of the Qwest service centers was done. No verification that the service center staff were adequately retrained to avoid making the mistakes that caused the original problems was attempted.

CGE&Y cites the IWOs as resolved and then brazenly highlights the Qwest FOC process as requiring remediation by Highly Recommending that Qwest revise the process at issue.

High	Qwest should expand edits of CLEC LSRs within the Business Process layer of the gateway systems prior to providing a Firm Order Confirmation in order to improve flow-through rates.
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This recommendation is circular on one hand and contradictory on another. CGE&Y would have Qwest expand its gateway edits so that CLEC LSRs are subject to more stringent and tighter form, format, and content disciplines than are currently applied. Tighter edits means more rejects. More rejects means fewer LSRs flow through to the service order processor. Flow through percentages might increase, but for fewer orders. However, The processes that generate FOCs are independent of those that have any effect on flow through of CLEC LSRs.

LSR flow through is achieved when CLEC orders are processed into Qwest's service order processor without manual intervention. Rejected orders do not contribute to the calculation of success – neither the denominator nor the numerator of the specific performance measure dealing with flow through, PO-2, is influenced by rejected orders. A CLEC order must be accepted in Qwest's system to be included in the PO-2 denominators. CGE&Y's recommendation does not consider this fact.

LSRs that cannot pass Qwest's gateway screening would cause more of them to be stopped at the gateway, rejected to the CLEC, and require CLEC representatives to locate the cause of the error and correct it for re-submission. A given LSR might eventually flow through, but the Qwest gantlet of edits and validation processes must be passed before the request is provisioned. CGE&Y's recommendation is to increase the complexity of that gantlet. The appropriate regimen of edits and validations to which CLEC LSRs are subject should be the same profile of form, format, and content validations that are applied to retail orders. A Qwest process that applies greater levels of scrutiny to CLEC orders is unfair and anticompetitive.

Improving Qwest's flow through rates is necessary so that LSRs can be processed as efficiently as Qwest's retail orders are processed. When CLEC orders fall out for manual processing, the capacities and capabilities of Qwest's work centers have direct and consequential affects that due dates can be met and that services can be provisioned as ordered. CGE&Y's recommendation to have Qwest increase flow through rates should have been raised as an IWO in the course of the test. The factors that prevent flow through are inaccurate, ambiguous, and imprecise documentation of the specifications that CLECs are to incorporate into their practices and procedures. If these specifications are accurate, and they are incorporated in the Qwest gateway and legacy systems, CLEC requests will flow through. CLECs that fail to incorporate those flow through specifications into their ordering systems invite the problems that attach to manual processing of their orders.

High	Changes made by an Account Manager that affect a CLEC need to be updated internally and communicated to other internal departments or through the CMP consistently.
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CGE&Y's suggestion is too vague for meaningful comment. The functions that Qwest Account Managers perform was to be fully evaluated by CGE&Y in the Relationship Management Test. Deficiencies that it discovered in the scope of those functions should have resulted in IWOs. Whatever design flaws CGE&Y finds in the Account Manager's roles and responsibilities, and the extent to which those staff fully discharge those responsibilities should be presented in the Relationship Management section of the test, and recorded as IWOs so that Qwest can undertake the appropriate corrective actions.

High	Add a facility availability query prior to the FOC edits to reduce facility jeopardy conditions.
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The problem raised in the course of the test that prompts this recommendation is that Qwest's FOC process does not confirm service requests will be provisioned as requested; it merely serves to confirm that the request was received. *See* AT&T's comments on CGE&Y's fourth High Priority recommendation, *infra*. In this recommendation, CGE&Y unclearly describes its view that the sequence of processing of a CLEC LSR be changed so that LSRs are not confirmed unless Qwest's records show that facilities sufficient to satisfy the LSR's requirements are available. This is a proper sequence of steps that would make Qwest's order confirmation process more reliable. The fundamental problem with Qwest's process is that far too few of the edit and validation steps are performed prior to confirmation; instead, they are done afterwards, which in turn negates the confirmation, increases the likelihood of order jeopardies, and places the CLEC at risk of irritating its end user. The more proper way for CGE&Y to advocate these process improvements is to issue an IWO that identifies the realm of LSR validation steps that are performed later than they should be and point out the negative consequences of them. Qwest would then respond with its plan for re-arranging its processing so that it generates reliable FOCs, according to industry-accepted meanings of Firm Order Confirmation.

High	Develop a process to perform a reconciliation of internal OSS databases (e.g., CRIS, LMOS, TIRKs, PREMIS, FACs) including switch and frame verification and audit to ensure accuracy of the inventory databases.
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CGE&Y's recommendation implies that Qwest's OSS databases are not synchronized and, as a result, central office records and other inventories are inaccurate. The events that brought this to CGE&Y's attention should have resulted in an IWO so that the explanation of what Qwest will do to develop a cross-database synchronization process would be out in the open, and subjected to "test until pass" verification methodology. Absent CGE&Y's identification of the specifics of its experience with inaccurate databases, or an explanation of why it believes the databases are incorrect, this recommendation is boundless. Qwest has OSS inventories of telephone numbers in service and available, loop information and related facilities, trunks, circuits, and perhaps hundreds more databases. CGE&Y should be required to frame this recommendation as an IWO and, in context, perhaps the most appropriate ones would be those that it encountered during the OSS Test.

High	Improve the timeliness of record updates from Qwest's provisioning systems to the various downstream OSS in regard to customer conversions.
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One of the most critical record updates that Qwest fails to perform on a timely basis is the updating of CSRs to reflect changes made to CLEC services. Qwest fails to perform this updating promptly (three to five business days is its practice, but it fails to consistently meet this guideline), delaying access to CLECs that need to serve their customers following order completions. *See AT&T comments regarding the Functionality Test where this issue is discussed in detail.*

AT&T agrees that Qwest should implement changes to its systems that would remove this anticompetitive process, but disagrees with CGE&Y that a recommendation should be the basis for implementation, and also that its implementation is optional. This built-in delay should

have been remedied via the IWO process, but was not because CGE&Y did not require sufficient response to its IWOs 2060 and 2101. CGE&Y's retesting was inadequate because it failed to attempt CSR retrievals within days proximate to order completion. This problem also has been raised in ROC testing.

**B. Medium and Low Priority Recommendations**


AT&T will not respond to the Medium and Low priority recommendations individually. However, each of the recommendations raises the same issue – an IWO should have been issued during the pendency of the test, the matter retested and resolved.

**IX. CONCLUSION**

The test of Qwest OSS has not been performed in accordance with the MTP and TSD and is not complete. AT&T's Comments make this point very clear. No other conclusion can be drawn. Furthermore, AT&T has been making this point repeatedly and for months. Simply put, the test performed by CGE&Y provides no reasonable basis for a conclusion that Qwest provides CLECs nondiscriminatory access to its OSS.

Respectfully submitted this 18th day of January, 2002.

**AT&T COMMUNICATIONS  
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# Exhibit 1



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Exhibit 1-1

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Centrex Form:Station Details Section 19:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 20:LTC required when ACT is N, V, or Z

Appointment required and/or APTCON field must be populated.

Informational message: Order was saved (PENDING status), not submitted and will be purged in 30 days

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ACT is N, V, or Z

Centrex Form:Station Details Section 17:LTC required when

ACT is N, V, or Z

Centrex Form:Station Details Section 18:LTC required when

ACT is N, V, or Z

Centrex Form:Station Details Section 19:LTC required when

ACT is N, V, or Z

Centrex Form:Station Details Section 20:LTC required when

ACT is N, V, or Z

Appointment required and/or APTCON field must be populated.

Informational message: Order was saved (PENDING status), not submitted and will be purged in 30 days

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# Informational

CONFIDENTIAL WSN CT 2001

Exhibit 1-2

## Messages:

Save successful...

Purge date is 2001/12/13.

LSR ID is 3464264.

LSR Form:Admin Section:AGAUTH required when ACT is N, W, V or Z

LSR Form:Admin Section:AGAUTH must be Y when ACT is N, W, V or Z

LSR Form:Admin Section:LST required when ACT is N, V or C

Centrex Form:Admin Section:CB required for ACT of N, V, Z, C, or T

Centrex Form:Station Details Section 1:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 2:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 3:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 4:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 5:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 6:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 7:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 8:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 9:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 10:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 11:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 12:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 13:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 14:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 15:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 16:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 17:LTC required when ACT is N, V, or Z

CONFIDENTIAL WSNCT 2002

# Informational

## Messages:

Save successful...

Purge date is 2001/12/13.

LSR ID is 3464008.

LSR Form:Admin Section:LST required when ACT is N, V or C

LSR Form:Bill Section:BAN1 invalid format

Centrex Form:Admin Section:CB required for ACT of N, V, Z, C, or T

Centrex Form:Station Details Section 1:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 1:IWJK Section 1:IWJQ must be between 1 and 99

Centrex Form:Station Details Section 2:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 3:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 4:The PIC/LPIC fields MUST contain either a four digit numeric code (place zeros in front of all non-four digit codes to make them four digits), or the word "None", or "DFLT"

Centrex Form:Station Details Section 4:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 5:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 6:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 7:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 8:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 9:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 10:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 11:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 12:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 13:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 14:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 15:LTC required when ACT is N, V, or Z

Centrex Form:Station Details Section 16:LTC required when

# Exhibit 2

# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
34								
	4/10/01	800 Number Dialing Capability	3:38:00 PM	3:38:00 PM	Successful	Successful		
	4/10/01	900 / 976 Blocking	3:35:00 PM	3:36:00 PM	Error "your call can't be completed as dialed, please check the number and dial again." Verified #, dialed again, same	Successful		
	4/10/01	Directory Assistance	3:40:00 PM	3:41:00 PM	1-800-275-8777	Successful	Yes	Yes
	4/10/01	In-State InterLATA Long Distance Call Completion	3:55:00 PM	3:55:00 PM	successful	Successful	Yes	
	4/10/01	In-State IntraLATA Long Distance Call Completion	3:58:00 PM	3:58:00 PM	not connected	Successful		
	4/10/01	IntraLATA Long Distance Carrier	3:45:00 PM	3:46:00 PM	not connected	Successful		
	4/10/01	Local Call Completion	3:51:00 PM	3:54:00 PM	Successful	Successful	Yes	
	4/10/01	Long Distance Call Completion	3:47:00 PM	3:47:00 PM	not connected	Successful		
	4/10/01	Long Distance Carrier Verification	3:43:00 PM	3:43:00 PM	not connected	Successful		
	4/10/01	One Plus Directory Assistance Call	3:59:00 PM	3:59:00 PM	not connected	Successful		
64								
	4/9/01	800 Number Dialing Capability	5:11:00 PM	5:11:00 PM	successful	Successful		
	4/9/01	900 / 976 Blocking	5:10:00 PM	5:10:00 PM	successful - "your call cannot be completed as dialed..."	Successful		
	4/9/01	Directory Assistance	5:15:00 PM	5:16:00 PM	successful 1-800-275-8777	Successful	Yes	Yes

# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
	4/9/01	In-State InterLATA Long Distance Call Completion	5:30:00 PM	5:31:00 PM	we're sorry a long distance access code is required to complete this call....."	Successful		
	4/9/01	In-State IntraLATA Long Distance Call Completion	5:32:00 PM	5:32:00 PM	we're sorry, a long distance access code is required to complete this call...."	Successful		
	4/9/01	IntraLATA Long Distance Carrier	5:21:00 PM	5:21:00 PM	got recording, "we're sorry, your call cannot bec completed as dialed. Please check the number ....."	Successful		
	4/9/01	Local Call Completion	5:28:00 PM	5:28:00 PM	we're sorry, it is not necessary to dial a 1. (tried twice)	Successful		
	4/9/01	Long Distance Call Completion	5:24:00 PM	5:27:00 PM	Kept getting recording, "we're sorry, you must dial a 1...." tried several times	Successful		
	4/9/01	Long Distance Carrier Verification	5:19:00 PM	5:19:00 PM	got recording "we're sorry a long distance company access code is required for the number you have dialed...."	Successful		
	4/9/01	One Plus Directory Assistance Call	5:34:00 PM	5:34:00 PM	we're sorry, a long distance access code is required.."	Successful		
	4/1/01	800 Number Dialing Capability	1:21:00 PM	1:22:00 PM	successful successful	Successful		
	4/1/01	900 / 976 Blocking	1:20:00 PM	1:21:00 PM	Verified Block successful	Successful		
	4/1/01	Directory Assistance	1:23:00 PM	1:24:00 PM	1-800-275-8777	Successful	Yes	Yes
	4/1/01	In-State InterLATA Long Distance Call Completion	1:31:00 PM	1:31:00 PM	successful	Successful	Yes	Yes
	4/1/01	In-State IntraLATA Long Distance Call Completion	1:31:00 PM	1:31:00 PM	successful	Successful	Yes	
	4/1/01	IntraLATA Long Distance Carrier	1:25:00 PM	1:29:00 PM	Qwest	Successful		
	4/1/01	Local Call Completion	1:30:00 PM	1:30:00 PM	successful	Successful	Yes	
	4/1/01	Long Distance Call Completion	1:29:00 PM	1:29:00 PM	successful	Successful	Yes	Yes

# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
243	4/1/01	Long Distance Carrier Verification	1:24:00 PM	1:25:00 PM	ATT	Successful		
	4/1/01	One Plus Directory Assistance Call	1:32:00 PM	1:33:00 PM	303-873-1046	Successful	Yes	
	4/10/01	800 Number Dialing Capability	11:19:00 AM	11:19:00 AM	none	Successful		
	4/10/01	900 / 976 Blocking	11:18:00 AM	11:18:00 AM	call cannot be completed	Successful		
	4/10/01	Directory Assistance	11:20:00 AM	11:21:00 AM	800-275-8777	Successful	Yes	Yes
	4/10/01	In-State InterLATA Long Distance Call Completion	11:26:00 AM	11:26:00 AM	16 seconds. Said I was re-directed to AT&T Acct Verification	Successful		
	4/10/01	In-State IntraLATA Long Distance Call Completion	11:27:00 AM	11:29:00 AM	call was one minute 40 seconds. Completed successfully	Successful	Yes	Yes
	4/10/01	IntraLATA Long Distance Carrier	11:24:00 AM	11:24:00 AM	call could not be completed as dialed	Successful		
	4/10/01	Local Call Completion	11:25:00 AM	11:25:00 AM	successfully completed.	Successful	Yes	
	4/10/01	Long Distance Call Completion	11:25:00 AM	11:25:00 AM	16 seconds, connected to operator for account verification	Successful		
	4/10/01	Long Distance Carrier Verification	11:22:00 AM	11:22:00 AM	N/A I have no long distance carrier. "075T" message #	Successful		
	4/10/01	One Plus Directory Assistance Call	11:30:00 AM	11:30:00 AM	re-directed to ATT for acct. verification.	Successful		
	4/10/01	800 Number Dialing Capability	5:50:00 AM	5:51:00 AM	ok	Successful		
	4/10/01	900 / 976 Blocking	5:49:00 AM	5:49:00 AM	Recorded message: "The call cannot be completed as dialed. Please check the number and try again."	Successful		
282	4/10/01	Directory Assistance	5:50:00 AM	5:51:00 AM	ok - only gives 800 number. Not local P.O.	Successful	Yes	Yes



# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
	4/10/01	In-State InterLATA Long Distance Call Completion	6:00:00 AM	6:00:00 AM	recording "...in order to complete..."	Successful		
	4/10/01	In-State IntraLATA Long Distance Call Completion	10:32:00 AM	10:32:00 AM	recording "...in order to complete..."	Successful		
	4/10/01	IntraLATA Long Distance Carrier	5:51:00 AM	5:51:00 AM	Recording asking for access code.	Successful		
	4/10/01	Local Call Completion	6:00:00 AM	6:00:00 AM	ok. 26 seconds	Successful	Yes	
	4/10/01	Long Distance Call Completion	5:53:00 AM	5:53:00 AM	Recording "It is not necessary to dial a 1..."	Successful		
	4/10/01	Long Distance Carrier Verification	5:51:00 AM	5:51:00 AM	none. Recording asking for access code	Successful		
	4/10/01	One Plus Directory Assistance Call	10:32:00 AM	10:32:00 AM	recording,...."you must dial a 1 or a 0 or the 3 digit access code."	Successful		
290								
	4/9/01	800 Number Dialing Capability	8:57:00 AM	8:57:00 AM	successful	Successful		
	4/9/01	900 / 976 Blocking	8:55:00 AM	8:56:00 AM	message: "Call can not be completed as dialed. Check the # and dial again."	Successful		
	4/9/01	Directory Assistance	8:58:00 AM	8:59:00 AM	1-800-275-8777	Successful	Yes	Yes
	4/9/01	In-State InterLATA Long Distance Call Completion	9:03:00 AM	9:03:00 AM	unsuccessful. "LD code required."	Successful		
	4/9/01	In-State IntraLATA Long Distance Call Completion	9:04:00 AM	9:04:00 AM	unsuccessful. "LD code required."	Successful		
	4/9/01	IntraLATA Long Distance Carrier	9:01:00 AM	9:01:00 AM	unsuccessful. "LD code required."	Successful		
	4/9/01	Local Call Completion	9:03:00 AM	9:03:00 AM	successful.	Successful		
	4/9/01	Long Distance Call Completion	9:02:00 AM	9:02:00 AM	unsuccessful. "LD code required."	Successful		
	4/9/01	Long Distance Carrier Verification	9:00:00 AM	9:00:00 AM	unsuccessful, not connected. Unable to place call, "LD code required."	Successful		
	4/9/01	One Plus Directory Assistance Call	9:04:00 AM	9:04:00 AM	unsuccessful. "LD code required."	Successful		

# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
<b>343</b>								
	4/10/01	800 Number Dialing Capability	11:05:00 AM	11:05:00 AM	successful	Successful		
	4/10/01	900 / 976 Blocking	11:03:00 AM	11:03:00 AM	Your call cannot be completed as dialed. Please check the number and dial again =	Successful		
	4/10/01	Directory Assistance	11:07:00 AM	11:07:00 AM	1-800-275-8777	Successful	Yes	
	4/10/01	In-State InterLATA Long Distance Call Completion	11:19:00 AM	11:19:00 AM	Access Code required for Long distance	Successful		
	4/10/01	In-State IntraLATA Long Distance Call Completion	11:20:00 AM	11:20:00 AM	Access code required for Long Distance	Successful		
	4/10/01	IntraLATA Long Distance Carrier	11:14:00 AM	11:14:00 AM	A long distance access code is required. Please hang up and dial your access code.	Successful		
	4/10/01	Local Call Completion	11:17:00 AM	11:17:00 AM	successful	Successful		
	4/10/01	Long Distance Call Completion	11:16:00 AM	11:16:00 AM	Access code required. Not connected	Successful		
	4/10/01	Long Distance Carrier Verification	11:12:00 AM	11:12:00 AM	A long distance access code is required. Please hang up and dial your access code.	Successful		
	4/10/01	One Plus Directory Assistance Call	11:21:00 AM	11:21:00 AM	Access code required for Long distance	Successful		
<b>349</b>								
	4/9/01	800 Number Dialing Capability	6:27:00 PM	6:28:00 PM	Thank you for calling cap gemini ernst & young	Successful		
	4/9/01	900 / 976 Blocking	6:25:00 PM	6:26:00 PM	Cannot be completed as dialed. Check the number and dial again.	Successful		
	4/9/01	Directory Assistance	6:30:00 PM	6:31:00 PM	Qwest D. Assist 1-800-275-8777	Successful	Yes	
	4/9/01	In-State InterLATA Long Distance Call Completion	6:38:00 PM	6:38:00 PM	LD Access code is required to complete this call.	Successful		
	4/9/01	In-State IntraLATA Long Distance Call Completion			N/A	Successful		

# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
	4/9/01	IntraLATA Long Distance Carrier	6:34:00 PM	6:35:00 PM	LD access code required for # dialed.	Successful		
	4/9/01	IntraLATA Long Distance Carrier	6:34:00 PM	6:35:00 PM	LD access code required for # dialed.	Successful		
	4/9/01	Local Call Completion	6:36:00 PM	6:37:00 PM	state of arizona testing successful	Successful	Yes	
	4/9/01	Long Distance Call Completion	6:35:00 PM	6:36:00 PM	LD access code required.	Successful		
	4/9/01	Long Distance Carrier Verification	6:32:00 PM	6:33:00 PM	None. Need an access code required for # dialed.	Successful		
	4/9/01	One Plus Directory Assistance Call	6:39:00 PM	6:39:00 PM	LD access code is required to complete this call.	Successful		
	4/9/01	800 Number Dialing Capability	7:35:00 PM	7:35:00 PM	connected/successful	Successful		
	4/9/01	900 / 976 Blocking	7:30:00 PM	7:30:00 PM	Successful. AAD not connected.	Successful		
	4/9/01	Directory Assistance	7:39:00 PM	7:40:00 PM	1-800-275-8777	Successful	Yes	
	4/9/01	In-State InterLATA Long Distance Call Completion	7:55:00 PM	7:58:00 PM	2 1/2 - 3 minutes	Successful	Yes	
	4/9/01	In-State IntraLATA Long Distance Call Completion	7:59:00 PM	8:02:00 PM	3 minutes	Successful	Yes	
	4/9/01	IntraLATA Long Distance Carrier	7:44:00 PM	7:44:00 PM	Qwest Long Distance	Successful		
	4/9/01	Local Call Completion	7:51:00 PM	7:54:00 PM	3 minutes	Successful	Yes	
	4/9/01	Long Distance Call Completion	7:46:00 PM	7:49:00 PM	3 minutes	Successful	Yes	
	4/9/01	Long Distance Carrier Verification	7:42:00 PM	7:43:00 PM	MCI	Successful		
	4/9/01	One Plus Directory Assistance Call	8:03:00 PM	8:04:00 PM	303-873-1046	Successful	Yes	

Totals	25	8
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## MEMORANDUM

DATE: 10 December 2002

TO: ROC TAG

FROM: Bob Stright  
The Liberty Consulting Group

RE: Reply to Qwest's Response to Observation 1028

### *Summary*

Qwest acknowledged the problems identified in the Observation report, however it considered the errors in mean-time-to-repair (MTTR) cited in the Observation to be isolated cases. Qwest proposed no new action, and instead stated that it would continue to conduct semi-annual compliance reviews and continue its random review/coaching program for technicians.

Liberty believes that the errors it found during the AT&T trouble ticket analysis in Arizona and Nebraska may be typical, rather than isolated, examples of errors. Liberty found significant indications of two types of errors, the cumulative effect of which may be unreliable historical MR-6 results.

### *Discussion*

Observation 1028 reported that there was a significant error rate in the MTTRs, or repair durations, used by Qwest in calculating its MR-6 measure for AT&T in Nebraska. Liberty specifically discussed three trouble tickets in the report, which translated into an error rate of roughly 15 percent based on the total number of Nebraska tickets examined. Qwest acknowledged in its response that the mistakes were due to human error, but considered these errors to be isolated instances. Qwest added that it conducted semi-annual compliance reviews in all five of its Design Service centers, routinely finding error rates of less than 1 percent. Qwest also noted that its center managers conduct random checks of trouble tickets on a weekly and monthly basis, and provide coaching whenever discrepancies are discovered.

In the course of its review of AT&T trouble tickets for the April through June 2001 period for Arizona and Nebraska, Liberty reviewed with Qwest log information on repair duration for 42 tickets. Qwest found sizeable errors in the MTTR in four of them, an error rate of nearly 10 percent. Also as part of its analysis, Liberty reviewed instances in which AT&T tickets had been assigned multiple Qwest trouble ticket numbers. Liberty reviewed with Qwest 120 AT&T trouble tickets from these two states, specifically focusing on whether individual tickets were or were not included in the MR-6 measure. Qwest found probable human errors in at least four tickets (roughly 3 percent), whereby

the code assigned to the ticket by its technicians precluded it from being included in the measure.<sup>1</sup>

Liberty believes that the routine reviews and training are positive steps. At this point, however, Liberty cannot ascertain whether such training and review programs have been effective, nor whether they were designed to capture the types of errors found during the audit. Further investigation is warranted to determine whether Qwest's proclaimed 1 percent error rate is accurate. Similarly, Liberty's analysis may have been based on too small a sample to provide a reliable estimate of error rate. Liberty therefore suggests two areas for further action:

1. Qwest should provide further information to Liberty on its semi-annual compliance reviews and its ad hoc review/coaching programs, including plans, scope, results and follow-up.
2. Liberty will expedite the reconciliation review of AT&T trouble tickets in Oregon, which would provide additional data on the nature and frequency of errors.

Liberty will inform the ROC-TAG when its review of the above two items is complete.

---

<sup>1</sup> Specifically, if a trouble ticket were closed to, for example, a customer premise equipment (CPE) code, it would correctly not be included in the measure. In these four cases, Qwest reviewed its logs and found that some repair work had been done on each ticket, so the trouble code assigned was in error. In each case, the trouble ticket should have been included in the measure but was not.

# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
34								
	4/10/01	800 Number Dialing Capability	3:38:00 PM	3:38:00 PM	Successful	Successful		
	4/10/01	900 / 976 Blocking	3:35:00 PM	3:36:00 PM	Error "your call can't be completed as dialed, please check the number and dial again." Verified #, dialed again, same	Successful		
	4/10/01	Directory Assistance	3:40:00 PM	3:41:00 PM	1-800-275-8777	Successful	Yes	Yes
	4/10/01	In-State InterLATA Long Distance Call Completion	3:55:00 PM	3:55:00 PM	successful	Successful	Yes	
	4/10/01	In-State IntraLATA Long Distance Call Completion	3:58:00 PM	3:58:00 PM	not connected	Successful		
	4/10/01	IntraLATA Long Distance Carrier	3:45:00 PM	3:46:00 PM	not connected	Successful		
	4/10/01	Local Call Completion	3:51:00 PM	3:54:00 PM	Successful	Successful	Yes	
	4/10/01	Long Distance Call Completion	3:47:00 PM	3:47:00 PM	not connected	Successful		
	4/10/01	Long Distance Carrier Verification	3:43:00 PM	3:43:00 PM	not connected	Successful		
	4/10/01	One Plus Directory Assistance Call	3:59:00 PM	3:59:00 PM	not connected	Successful		
64								
	4/9/01	800 Number Dialing Capability	5:11:00 PM	5:11:00 PM	successful	Successful		
	4/9/01	900 / 976 Blocking	5:10:00 PM	5:10:00 PM	successful - "your call cannot be completed as dialed...."	Successful		
	4/9/01	Directory Assistance	5:15:00 PM	5:16:00 PM	successful 1-800-275-8777	Successful	Yes	Yes

# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
	4/9/01	In-State InterLATA Long Distance Call Completion	5:30:00 PM	5:31:00 PM	we're sorry a long distance access code is required to complete this call....."	Successful		
	4/9/01	In-State IntraLATA Long Distance Call Completion	5:32:00 PM	5:32:00 PM	we're sorry, a long distance access code is required to complete this call...."	Successful		
	4/9/01	IntraLATA Long Distance Carrier	5:21:00 PM	5:21:00 PM	got recording, "we're sorry, your call cannot bee completed as dialed. Please check the number ....."	Successful		
	4/9/01	Local Call Completion	5:28:00 PM	5:28:00 PM	we're sorry, it is not necessary to dial a 1. (tried twice)	Successful		
	4/9/01	Long Distance Call Completion	5:24:00 PM	5:27:00 PM	Kept getting recording, "we're sorry, you must dial a 1...." tried several times	Successful		
	4/9/01	Long Distance Carrier Verification	5:19:00 PM	5:19:00 PM	got recording "we're sorry a long distance company access code is required for the number you have dialed...."	Successful		
	4/9/01	One Plus Directory Assistance Call	5:34:00 PM	5:34:00 PM	we're sorry, a long distance access code is required.."	Successful		
	4/1/01	800 Number Dialing Capability	1:21:00 PM	1:22:00 PM	successful successful	Successful		
	4/1/01	900 / 976 Blocking	1:20:00 PM	1:21:00 PM	Verified Block successful	Successful		
	4/1/01	Directory Assistance	1:23:00 PM	1:24:00 PM	1-800-275-8777	Successful	Yes	Yes
	4/1/01	In-State InterLATA Long Distance Call Completion	1:31:00 PM	1:31:00 PM	successful	Successful	Yes	Yes
	4/1/01	In-State IntraLATA Long Distance Call Completion	1:31:00 PM	1:31:00 PM	successful	Successful	Yes	
	4/1/01	IntraLATA Long Distance Carrier	1:25:00 PM	1:29:00 PM	Qwest	Successful		
	4/1/01	Local Call Completion	1:30:00 PM	1:30:00 PM	successful	Successful	Yes	
	4/1/01	Long Distance Call Completion	1:29:00 PM	1:29:00 PM	successful	Successful	Yes	

# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
243	4/1/01	Long Distance Carrier Verification	1:24:00 PM	1:25:00 PM	ATT	Successful		
	4/1/01	One Plus Directory Assistance Call	1:32:00 PM	1:33:00 PM	303-873-1046	Successful	Yes	
	4/10/01	800 Number Dialing Capability	11:19:00 AM	11:19:00 AM	none	Successful		
	4/10/01	900 / 976 Blocking	11:18:00 AM	11:18:00 AM	call cannot be completed	Successful		
	4/10/01	Directory Assistance	11:20:00 AM	11:21:00 AM	800-275-8777	Successful	Yes	Yes
	4/10/01	In-State InterLATA Long Distance Call Completion	11:26:00 AM	11:26:00 AM	16 seconds. Said I was re-directed to AT&T Acct Verification	Successful		
	4/10/01	In-State IntraLATA Long Distance Call Completion	11:27:00 AM	11:29:00 AM	call was one minute 40 seconds. Completed successfully	Successful	Yes	Yes
	4/10/01	IntraLATA Long Distance Carrier	11:24:00 AM	11:24:00 AM	call could not be completed as dialed	Successful		
	4/10/01	Local Call Completion	11:25:00 AM	11:25:00 AM	successfully completed.	Successful	Yes	
	4/10/01	Long Distance Call Completion	11:25:00 AM	11:25:00 AM	16 seconds, connected to operator for account verification	Successful		
	4/10/01	Long Distance Carrier Verification	11:22:00 AM	11:22:00 AM	N/A I have no long distance carrier. "075T" message #	Successful		
	4/10/01	One Plus Directory Assistance Call	11:30:00 AM	11:30:00 AM	re-directed to ATT for acct. verification.	Successful		
282	4/10/01	800 Number Dialing Capability	5:50:00 AM	5:51:00 AM	ok	Successful		
	4/10/01	900 / 976 Blocking	5:49:00 AM	5:49:00 AM	Recorded message: "The call cannot be completed as dialed. Please check the number and try again."	Successful		
	4/10/01	Directory Assistance	5:50:00 AM	5:51:00 AM	ok - only gives 800 number. Not local P.O.	Successful	Yes	Yes



# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
	4/10/01	In-State InterLATA Long Distance Call Completion	6:00:00 AM	6:00:00 AM	recording "...in order to complete..."	Successful		
	4/10/01	In-State IntraLATA Long Distance Call Completion	10:32:00 AM	10:32:00 AM	recording "...in order to complete..."	Successful		
	4/10/01	IntraLATA Long Distance Carrier	5:51:00 AM	5:51:00 AM	Recording asking for access code.	Successful		
	4/10/01	Local Call Completion	6:00:00 AM	6:00:00 AM	ok. 26 seconds	Successful	Yes	
	4/10/01	Long Distance Call Completion	5:53:00 AM	5:53:00 AM	Recording "It is not necessary to dial a 1..."	Successful		
	4/10/01	Long Distance Carrier Verification	5:51:00 AM	5:51:00 AM	none. Recording asking for access code	Successful		
	4/10/01	One Plus Directory Assistance Call	10:32:00 AM	10:32:00 AM	recording....."you must dial a 1 or a 0 or the 3 digit access code."	Successful		
290	4/9/01	800 Number Dialing Capability	8:57:00 AM	8:57:00 AM	successful	Successful		
	4/9/01	900 / 976 Blocking	8:55:00 AM	8:56:00 AM	message: "Call can not be completed as dialed. Check the # and dial again."	Successful		
	4/9/01	Directory Assistance	8:58:00 AM	8:59:00 AM	1-800-275-8777	Successful	Yes	Yes
	4/9/01	In-State InterLATA Long Distance Call Completion	9:03:00 AM	9:03:00 AM	unsuccessful. "LD code required."	Successful		
	4/9/01	In-State IntraLATA Long Distance Call Completion	9:04:00 AM	9:04:00 AM	unsuccessful. "LD code required."	Successful		
	4/9/01	IntraLATA Long Distance Carrier	9:01:00 AM	9:01:00 AM	unsuccessful. "LD code required."	Successful		
	4/9/01	Local Call Completion	9:03:00 AM	9:03:00 AM	successful.	Successful		
	4/9/01	Long Distance Call Completion	9:02:00 AM	9:02:00 AM	unsuccessful. "LD code required."	Successful		
	4/9/01	Long Distance Carrier Verification	9:00:00 AM	9:00:00 AM	unsuccessful, not connected. Unable to place call, "LD code required."	Successful		
	4/9/01	One Plus Directory Assistance Call	9:04:00 AM	9:04:00 AM	unsuccessful. "LD code required."	Successful		

# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
343								
4/10/01	800	Number Dialing Capability	11:05:00 AM	11:05:00 AM	successful	Successful		
4/10/01	900 / 976	Blocking	11:03:00 AM	11:03:00 AM	Your call cannot be completed as dialed. Please check the number and dial again =	Successful		
4/10/01	Directory Assistance		11:07:00 AM	11:07:00 AM	1-800-275-8777	Successful	Yes	
4/10/01	In-State InterLATA Long Distance Call Completion		11:19:00 AM	11:19:00 AM	Access Code required for Long distance	Successful		
4/10/01	In-State IntraLATA Long Distance Call Completion		11:20:00 AM	11:20:00 AM	Access code required for Long Distance	Successful		
4/10/01	IntraLATA Long Distance Carrier		11:14:00 AM	11:14:00 AM	A long distance access code is required. Please hang up and dial your access code.	Successful		
4/10/01	Local Call Completion		11:17:00 AM	11:17:00 AM	successful	Successful		
4/10/01	Long Distance Call Completion		11:16:00 AM	11:16:00 AM	Access code required. Not connected	Successful		
4/10/01	Long Distance Carrier Verification		11:12:00 AM	11:12:00 AM	A long distance access code is required. Please hang up and dial your access code.	Successful		
4/10/01	One Plus Directory Assistance Call		11:21:00 AM	11:21:00 AM	Access code required for Long distance	Successful		
349								
4/9/01	800	Number Dialing Capability	6:27:00 PM	6:28:00 PM	Thank you for calling cap gemini ernst & young	Successful		
4/9/01	900 / 976	Blocking	6:25:00 PM	6:26:00 PM	Cannot be completed as dialed. Check the number and dial again.	Successful		
4/9/01	Directory Assistance		6:30:00 PM	6:31:00 PM	Qwest D. Assist 1-800-275-8777	Successful	Yes	
4/9/01	In-State InterLATA Long Distance Call Completion		6:38:00 PM	6:38:00 PM	LD Access code is required to complete this call.	Successful		
4/9/01	In-State IntraLATA Long Distance Call Completion				N/A	Successful		

# AT&T Call Detail Record Provisioning Analysis

ContactsID	Call Date	Test Case Description	Start Time	End Time	Comments	Test Status	DUF Expected	DUF Received
	4/9/01	IntraLATA Long Distance Carrier	6:34:00 PM	6:35:00 PM	LD access code required for # dialed.	Successful		
	4/9/01	IntraLATA Long Distance Carrier	6:34:00 PM	6:35:00 PM	LD access code required for # dialed.	Successful		
	4/9/01	Local Call Completion	6:36:00 PM	6:37:00 PM	state of arizona testing successful	Successful	Yes	
	4/9/01	Long Distance Call Completion	6:35:00 PM	6:36:00 PM	LD access code required.	Successful		
	4/9/01	Long Distance Carrier Verification	6:32:00 PM	6:33:00 PM	None. Need an access code required for # dialed.	Successful		
	4/9/01	One Plus Directory Assistance Call	6:39:00 PM	6:39:00 PM	LD access code is required to complete this call.	Successful		
511								
	4/9/01	800 Number Dialing Capability	7:35:00 PM	7:35:00 PM	connected/successful	Successful		
	4/9/01	900 / 976 Blocking	7:30:00 PM	7:30:00 PM	Successful. AAD not connected.	Successful		
	4/9/01	Directory Assistance	7:39:00 PM	7:40:00 PM	1-800-275-8777	Successful	Yes	
	4/9/01	In-State InterLATA Long Distance Call Completion	7:55:00 PM	7:58:00 PM	2 1/2 - 3 minutes	Successful	Yes	
	4/9/01	In-State IntraLATA Long Distance Call Completion	7:59:00 PM	8:02:00 PM	3 minutes	Successful	Yes	
	4/9/01	IntraLATA Long Distance Carrier	7:44:00 PM	7:44:00 PM	Qwest Long Distance	Successful		
	4/9/01	Local Call Completion	7:51:00 PM	7:54:00 PM	3 minutes	Successful	Yes	
	4/9/01	Long Distance Call Completion	7:46:00 PM	7:49:00 PM	3 minutes	Successful	Yes	
	4/9/01	Long Distance Carrier Verification	7:42:00 PM	7:43:00 PM	MCI	Successful		
	4/9/01	One Plus Directory Assistance Call	8:03:00 PM	8:04:00 PM	303-873-1046	Successful	Yes	

Totals	25	8
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# OAKVILLE GROCERY

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## 6 Places to Shop

Unique selections at each...

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### *Palo Alto*

The second Oakville Grocery store is located in the Stanford Shopping Center in Palo Alto, about 30 miles south of San Francisco. Joining seven other tenants who pioneered the first successful outdoor food market in an upscale shopping center, this store opened in June, 1988.

Called The Street Market, this food court is modeled on European market streets and features Schaub's Meat, Fish and Poultry of Los Gatos, a large produce market, a coffee roastery, flower market and cafes. The Stanford store boasts one of the finest cheese departments in California, a large selection of prepared foods, and a locally famous sandwich department. Our Stanford location also has an extensive and diverse wine department. This store enjoys the benefits of being both adjacent to Stanford University and at the gateway to Silicon Valley. Both are strong networks of food and wine lovers from around the world.

### Other Oakville Grocery Locations

#### **Oakville Grocery**

##### **- Palo Alto -**

715 Stanford Shopping Center  
Palo Alto, CA 94304

>Tel: 650/328-9000

>Fax: 650/328-6513

##### **Hours:**

10 AM-7 PM Mon-Thurs

10 AM-7:30 PM Friday


10 AM-7 PM Saturday

10 AM-6 PM Sunday

Store Manager: Jim Wagner

[jwagner@oakvillegrocery.com](mailto:jwagner@oakvillegrocery.com)

##### Map & Directions

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## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **AT&T's Comments on Draft Final Report** in Docket No. T-00000A-97-0238 were sent by overnight delivery on January 18, 2002 to:

Arizona Corporation Commission  
Docket Control – Utilities Division  
1200 West Washington Street  
Phoenix, AZ 85007

and a true and correct copy was sent by overnight delivery on January 18, 2002 to:

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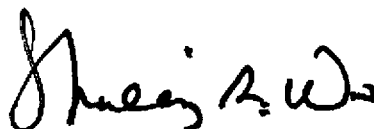
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